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IN THE SUPREME COURT OF FLORIDA

Case No.: SC2025-1102

DCA CASE NOS.: 2D2024-2687, 2D2024-2688

LT CASE NOS.: 24-003717-CI; 24-003995-CI

CHRISTOPHER GLEASON,
Petitioner,

v.

SECOND DISTRICT COURT OF APPEAL, et al.,
Respondents.

Judicial Conflict Appendix (Tabs A–Z)

This Appendix contains verified factual and legal bases for disqualification of identified judges, organized into Tabs A–Z with supporting authorities and evidentiary references. It also incorporates Appendix C, which documents prima facie statutory violations concerning Sunday June 23, 2024 and September 9, 2024 VBM requests.

Submitted by:
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Date: 08/27/2025

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Introductory Preface

This Judicial Conflict Appendix is intended to be read in conjunction with:

- Appendix B – Verified Authorities.
- Appendix C – Prima Facie Statutory Violations.

Remedy Matrix – Judge Disqualification Grounds

Judge	Conflict Type(s)	Controlling Authority	Remedy
Craig C. Villanti (Tab A)	Victim of fraudulent VBM activity; Material witness	Canon 3E(1)(a), (d); Canon 2A; §§ 38.02, 38.10; Livingston; Lightsey; Caperton; Williams; Jenkins; JEAC Ops. 17-20 & 18-13; State v. Smith	Mandatory disqualification; Orders void ab initio; Reassignment
Nelly Khouzam (Tab B)	Victim of anomalies; Spousal tie to Silberman	Canon 3E(1)(a), (d); Canon 2A; §§ 38.02, 38.10; Livingston; Caperton; Williams; Jenkins; JEAC Op. 17-20; State v. Smith	Mandatory disqualification; Orders void ab initio; Reassignment
Daniel H. Silberman (Tab C)	Victim of anomalies; Spousal tie; Daughter's anomalies	Canon 3E(1)(a), (d); Canon 2A; §§ 38.02, 38.10; Livingston; Caperton; Williams; Jenkins; JEAC	Mandatory disqualification; Orders void ab initio; Reassignment

		Op. 17-20; State v. Smith	
Susan Rothstein-Youakim (Tab D)	Retention election impacted; Parents' anomalies	Canon 3E(1)(a), (d); Canon 2A; §§ 38.02, 38.10; Livingston; Caperton; Williams; Jenkins; JEAC Op. 17-20; State v. Smith	Mandatory disqualification; Orders void ab initio; Reassignment
Darryl LaRose (Tab E)	Retention election impacted	Canon 3E(1)(a); Canon 2A; § 38.10; Livingston; Caperton; Williams; Jenkins; State v. Smith	Mandatory disqualification; Orders void ab initio; Reassignment
Matthew C. Black (Tab F)	Retention election impacted	Canon 3E(1)(a); Canon 2A; § 38.10; Livingston; Caperton; Williams; Jenkins; State v. Smith	Mandatory disqualification; Orders void ab initio; Reassignment
Patricia Muscarella	Victim of anomalies;	Rule 2.330; §§ 38.02, 38.10;	Mandatory disqualification;

(Tab G)	Material witness; Procedural bias	Canon 2A; Livingston; Lightsey; Williams; Jenkins; State v. Smith	Orders void ab initio; Reassignment
Peter Ramsberger (Tab H)	Familial conflict (son Thomas; Angela, protected voter; Kerry, Katherine, Kelsey anomalies)	Rule 2.330(e)(2); §§ 38.02, 38.10; Canon 2A; Livingston; Williams; Jenkins; JEAC Op. 17-20; State v. Smith	Mandatory disqualification; Orders void ab initio; Reassignment
Shawn Crane (Tab I)	Assignment conflict; Presiding conflict; Conflict via judicial assistant (Louise Smith victimized); Administrative misconduct; Personal knowledge of affidavits	Rule 2.330(e)(4); §§ 38.02, 38.10; Canon 2A; Canon 3E(1)(a), (d); Livingston; Williams; Jenkins; JEAC Op. 17-20; State v. Smith	Mandatory disqualification; Orders void ab initio; Reassignment

Tabs A–J Narratives

The conflicted judges' refusals to disqualify contravene the procedural safeguards and ethical imperatives outlined in the 2023 Florida Judicial College Guide to Disqualification and Recusal (Phase II – March 2023) [hereinafter Guide], which mandates that judges 'Stop, Drop, and Rule' on motions within 30 days, taking allegations as true without contesting facts (Guide at 2-3, 19, citing Livingston v. State, 441 So. 2d 1083 (Fla. 1983)). Here, Judge Muscarella's summary denials as 'legally insufficient' without analysis ignored this directive (Guide at 20), rendering orders void ab initio (Jenkins v. Motorola, Inc., 911 So. 2d 196 (Fla. 3d DCA 2005)). Similarly, judges with personal/familial conflicts (e.g., victimization in DOS records) must recuse voluntarily under Canon 3E(1) when impartiality is reasonably questioned (Guide at 10-11, 27-29; JEAC Op. 17-20, reprinted in Guide at 36-37), yet their refusals perpetuate structural error (Williams v. Pennsylvania, 579 U.S. 1 (2016)) and fundamental error destroying fairness (State v. Smith, 240 So. 2d 807 (Fla. 1970); Guide at 15-16, 19). This unrebutted prima facie evidence, as in Ruff v. Cooper, 169 So. 490 (Fla. 1936), shifts the burden to Respondents

and warrants prohibition to halt proceedings tainted by bias (Guide at 1, emphasizing litigant-focused impartiality).

Tab A – Judge Craig C. Villanti
Court: Second District Court of Appeal (2DCA)

Conflict Type(s):

- **Victim of fraudulent VBM activity:** DOS records show unauthorized VBM requests in his name (June 23, 2024 & Sept. 9, 2024, both flagged "N" = no ID).
- **Protected voter anomaly:** as a judge, his data was shielded under § 97.0585, Fla. Stat.; such requests were procedurally impossible without insider override.
- **Material witness:** only he can testify to whether the requests were authorized and explain the anomalies.

Governing Authorities

- **Canon 3E(1)(a), (d), Fla. Code Jud. Conduct** – disqualification mandatory where impartiality may reasonably be questioned, or judge is a material witness.
- **Canon 2A** – judges must avoid even the appearance of impropriety.
- **§ 38.02, Fla. Stat.** – mandatory disqualification if judge or close relative is a material witness.
- **§ 38.10, Fla. Stat.** – affidavit of bias requires reassignment.
- **Livingston v. State**, 441 So. 2d 1083 (Fla. 1983) – verified allegations deemed true; sufficiency = **well-founded fear of bias**.
- **Lightsey v. State**, 53 So. 3d 1093 (Fla. 1st DCA 2011) – material-witness judge must recuse.
- **Williams v. Pennsylvania**, 579 U.S. 1 (2016) – judge's personal involvement = structural error.

- **Jenkins v. Motorola, Inc.**, 911 So. 2d 196 (Fla. 3d DCA 2005) – post-disqualification rulings are void.
- **JEAC Op. 18-13** – recusal required when judge has personal knowledge of disputed facts.
- **JEAC Op. 17-20** – recusal mandatory when judge or close relatives are implicated.
- **State v. Smith**, 240 So. 2d 807 (Fla. 1970) – fundamental error occurs when fairness of proceeding is destroyed.

Detailed Evidentiary Analysis

1. Factual Basis & Prima Facie Evidence (*Livingston*)

- **DOS Reports:**
  - June 23, 2024 request: entered on a Sunday (SOE offices closed), flagged "N."
  - Sept. 9, 2024 duplicate: flagged "N."
  - **Both requests flagged "N" = no verified ID, violating § 101.62(1)(b), Fla. Stat., which requires a DL number or last four of SSN.**
- **Protected voter anomaly:** Villanti's voter record was shielded under § 97.0585, Fla. Stat. Insider override was required.
- **Affidavit of John Siamas (April 2025):** confirmed such anomalies required insider override or fraud.
- **Felony implications:**
  - **§ 104.047(4)(a)** – unauthorized ballot requests.
  - **§ 104.011(1)** – false affirmations.
- **Self-Authentication:** DOS reports are public records (§ 90.902(1)); affidavits corroborate them.

2. Judge Villanti as a Victim of Fraud

- Fraudulent entries compromised his voter integrity, making him a **direct victim**.
- Creates a **direct interest in the litigation**.
- A **reasonably prudent person** would fear Judge Villanti might unconsciously:
    - **Downplay fraud** to avoid personal embarrassment, or
    - **Disfavor Petitioner Gleason**, who exposed his anomalies.
- Under *Livingston*, these facts, deemed true, establish a **well-founded fear of bias**.

3. Judge Villanti as a Material Witness

- He alone can testify to whether he authorized either ballot request.
- He must explain how a Sunday request was logged, and why a duplicate appeared in September.
- This makes him a **material witness** under § 38.02 and Canon 3E(1)(a).
- *Lightsey* and JEAC Op. 18-13 confirm such judges must recuse.
- **JEAC Op. 17-20** further removes discretion, as it requires recusal where the judge or relatives are implicated — here, Villanti himself is directly implicated.

4. Structural Error & Void Orders

- Judge Villanti's participation despite being a victim-witness judge constitutes **structural due-process error** (*Williams*).
- Under *Jenkins*, all rulings after a legally sufficient disqualification motion are **void ab initio**.

5. Fundamental Error

- Under **State v. Smith**, fundamental error occurs when fairness of the proceeding is destroyed.
- Judge Villanti's continued participation despite being both a **victim of fraudulent VBM activity** and a **material witness** is not only structural error, but also **fundamental error under Florida law**.
- Proceeding before a judge personally implicated in the very misconduct under litigation deprives Petitioner of due process.
- Such error is **not subject to waiver** and independently requires reversal.

Conclusion – Tab A

Judge Craig C. Villanti's disqualification is **mandatory**. He is both a **victim of fraudulent VBM anomalies** and a **material witness** with personal knowledge of disputed facts. Verified DOS reports and affidavits create a **well-founded fear of bias** under *Livingston*. His continued participation constitutes **structural error under federal law** and **fundamental error under Florida law**, rendering all rulings **void ab initio**. Prohibition and reassignment are required.

Tab B – Judge Nelly Khouzam
Court: Second District Court of Appeal (2DCA)

Conflict Type(s):

- Victim of fraudulent VBM activity.
- Material witness with personal knowledge of disputed evidentiary facts.
- **Spousal tie to Judge Daniel H. Silberman** (also conflicted).
- Protected voter status compromised.

Governing Authorities

- **Canon 3E(1)(a), (d), Fla. Code Jud. Conduct** – disqualification mandatory where impartiality may reasonably be questioned, or judge is a material witness.
- **Canon 2A** – avoid even the appearance of impropriety.
- **§ 38.02, Fla. Stat.** – mandatory disqualification if judge or close relative is a material witness.
- **§ 38.10, Fla. Stat.** – affidavit of fear of bias requires reassignment.
- **Livingston v. State**, 441 So. 2d 1083 (Fla. 1983) – verified facts deemed true; sufficiency = **well-founded fear of bias**.
- **Lightsey v. State**, 53 So. 3d 1093 (Fla. 1st DCA 2011) – material-witness judge must recuse.
- **Williams v. Pennsylvania**, 579 U.S. 1 (2016) – judge's personal involvement = structural error.
- **Jenkins v. Motorola, Inc.**, 911 So. 2d 196 (Fla. 3d DCA 2005) – post-disqualification orders are void.
- **JEAC Op. 18-13** – recusal required when judge has personal knowledge of disputed facts.

- **JEAC Op. 17-20** – recusal **mandatory** when a judge or close relative is implicated in disputed facts.

Remedy Requested

- Immediate disqualification under Canon 3E and §§ 38.02, 38.10.
- Vacatur of all orders in which Judge Khouzam participated as **void ab initio**.
- Reassignment to an impartial appellate panel.

Detailed Evidentiary Analysis

1. Factual Basis & Prima Facie Evidence (*Livingston*)

- **DOS Reports** ("Vote-By-Mail Early Voting Reports") document unauthorized ballot requests logged under Judge Khouzam's name in 2024.
- Both requests flagged **"N" = no verified ID**, violating **§ 101.62(1)(b), Fla. Stat.**, which requires a driver's license number or last four of SSN.
- Judge Khouzam is a **protected voter** under § 97.0585, Fla. Stat., meaning her information cannot be accessed through public online portals. Requests could only be made through manual override by SOE staff with elevated credentials.
- **Affidavit of John Siamas (April 2025)** confirms such entries are procedurally impossible without insider involvement.
- Fraudulent entries violate felony statutes:
    - **§ 104.047(4)(a)** – unlawful ballot requests.
    - **§ 104.011(1)** – false affirmations in elections.

- **Self-Authentication:** DOS reports are official public records under **§ 90.902(1), Fla. Stat.**; sworn affidavits with independent chain of custody confirm their authenticity.

2. Judge Khouzam as a Victim of Fraud

- Unauthorized entries in her voter record compromised her integrity as a voter, making her a **direct victim** of the fraud scheme at issue.
- This personal victimization creates a **direct interest in the outcome** of Gleason's election-fraud litigation, which challenges the same SOE misconduct.
- A **reasonably prudent person** would fear Judge Khouzam might unconsciously:
    - **Downplay fraud** to avoid personal embarrassment, or
    - **Disfavor Petitioner Gleason**, who exposed her record anomalies.
- Under *Livingston*, these facts must be deemed **true** and establish a **well-founded fear of bias**, which by itself mandates disqualification.
- **Canon 2A** and *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009) further support that even an appearance of self-interest violates due process.

3. Judge Khouzam as a Material Witness

- She alone can testify to key disputed facts:
    1. Whether she authorized either ballot request.
    2. How a request could be entered given her protected-voter restrictions.

- This makes her a **material witness** under § 38.02 and Canon 3E(1)(a).
- *Lightsey* and **JEAC Op. 18-13** confirm that judges with personal knowledge of disputed evidentiary facts must recuse.

4. Spousal Tie to Judge Silberman

- Judge Khouzam is married to Judge Daniel H. Silberman, whose own voter record and whose **daughter's record** both show fraudulent VBM anomalies.
- **JEAC Op. 17-20** mandates disqualification where either the judge **or a close relative** is implicated in disputed facts.
- Here, both spouses are directly implicated in the same fraudulent scheme — a double-trigger for mandatory recusal.

5. Structural Error & Void Orders

- Under *Williams*, participation by a victim-witness judge is a **structural error**, not subject to harmless-error review.
- Under *Jenkins*, all rulings after a sufficient disqualification motion are **void ab initio**.

6. Procedural Strength

- **Discovery Date:** April 15, 2025.
- Verified motion filed within 20 days, timely under Rule 2.330(g) by analogy.
- Record supported by:
    - DOS reports (self-authenticating).
    - Verified affidavits (Siamas, Gleason).

    - Recusal Fact Matrix (Appendix C).
- Under *Livingston*, these facts are deemed **true**; the only inquiry is whether they create a **well-founded fear of bias**.

Conclusion – Tab B

Judge Nelly Khouzam's disqualification is **mandatory**. She is simultaneously a **victim** of fraudulent VBM activity, a **material witness**, and is further conflicted by her **spousal tie to Judge Silberman**. Her personal victimization and family implication establish a **well-founded fear of bias** under *Livingston*. **JEAC Op. 17-20** confirms recusal is not optional where judge or close relative is implicated. Her continued participation is a **structural due-process violation**, requiring prohibition, vacatur of her orders, and reassignment to an unconflicted panel.

Tab C – Judge Daniel H. Silberman
Court: Second District Court of Appeal (2DCA)

Conflict Type(s):

- Victim of fraudulent Vote-By-Mail (VBM) activity.
- Material witness with personal knowledge of disputed evidentiary facts.
- **Spousal tie to Judge Nelly Khouzam** (also implicated).
- **Familial conflict: his daughter's voter record also targeted with fraudulent VBM requests.**
- Protected voter status compromised.

Governing Authorities

- **Canon 3E(1)(a), (d), Fla. Code Jud. Conduct** – disqualification mandatory where impartiality may reasonably be questioned, or judge/close relative is implicated.
- **Canon 2A** – avoid even the appearance of impropriety.
- **§ 38.02, Fla. Stat.** – disqualification required if judge or close relative is a material witness.
- **§ 38.10, Fla. Stat.** – affidavit of bias suffices for recusal.
- **Livingston v. State**, 441 So. 2d 1083 (Fla. 1983) – verified facts deemed true; sufficiency = **well-founded fear of bias**.
- **Lightsey v. State**, 53 So. 3d 1093 (Fla. 1st DCA 2011) – material-witness judge must recuse.
- **Williams v. Pennsylvania**, 579 U.S. 1 (2016) – judge's personal involvement = structural error.
- **Jenkins v. Motorola, Inc.**, 911 So. 2d 196 (Fla. 3d DCA 2005) – orders entered after sufficient disqualification are void.

- **JEAC Op. 18-13** – recusal required when judge has personal knowledge of disputed facts.
- **JEAC Op. 17-20** – recusal **mandatory** when judge or close relative is implicated in disputed facts.

Remedy Requested

- Immediate disqualification under Canon 3E and §§ 38.02, 38.10.
- Vacatur of all orders in which Judge Silberman participated as **void ab initio**.
- Reassignment to an impartial appellate panel.

Detailed Evidentiary Analysis

1. Factual Basis & Prima Facie Evidence (*Livingston*)

- **DOS Reports** ("Vote-By-Mail Early Voting Reports") show unauthorized VBM requests logged under Judge Silberman's name in 2024.
- Requests flagged **"N" = no verified ID**, violating **§ 101.62(1)(b), Fla. Stat.**
- Duplicate requests violate **Rule 1S-2.055(3)(d), Fla. Admin. Code**, which prohibits unnecessary duplicates.
- Judge Silberman is a **protected voter** under § 97.0585, Fla. Stat., meaning his record could not be accessed without insider override.
- **Affidavit of John Siamas (April 2025)** confirms such entries required insider action or forgery.
- Fraudulent entries implicate felony statutes:
    - **§ 104.047(4)(a)** – unauthorized ballot requests.

    - **§ 104.011(1)** – false affirmations in elections.
- **Daughter's voter record also flagged:** DOS reports document fraudulent VBM requests for **his daughter**, likewise flagged without ID verification.
- **Self-Authentication:** DOS reports qualify as public records (§ 90.902(1)); sworn affidavits with chain of custody corroborate them.

2. Judge Silberman as a Victim of Fraud

- Fraudulent entries under his name compromised his voter integrity, making him a **direct victim** of the scheme at issue.
- This personal victimization creates a **direct interest in the outcome** of Gleason's election-fraud litigation, which challenges the same SOE conduct.
- A **reasonably prudent person** would fear Judge Silberman might unconsciously:
    - **Downplay fraud** to avoid personal embarrassment, or
    - **Disfavor Petitioner Gleason**, who exposed his and his family's record anomalies.
- Under *Livingston*, such facts, accepted as true, establish a **well-founded fear of bias** requiring disqualification.

3. Judge Silberman as a Material Witness

- He alone can testify to:
    1. Whether he personally authorized the ballot requests.
    2. How his protected voter record was accessed despite restrictions.
    3. Why duplicate requests appeared in the DOS logs.

- This makes him a **material witness** under § 38.02 and Canon 3E(1)(a).
- *Lightsey* and **JEAC Op. 18-13** make recusal mandatory when a judge has such personal knowledge.

4. Spousal Tie to Judge Khouzam

- Judge Silberman is married to Judge Khouzam, whose own voter record showed fraudulent anomalies.
- Under **JEAC Op. 17-20**, disqualification is mandatory where a judge's **close relative** is implicated.
- Both spouses being listed in DOS reports doubles the ethical and statutory conflicts.

5. Daughter's Voter Record

- Silberman's **daughter** also appears in DOS records with unauthorized VBM entries.
- This creates a **familial conflict** under Canon 3E(1)(d) and **JEAC Op. 17-20**.
- Disqualification is mandatory when not only the judge but also his child is implicated in disputed facts central to the litigation.

6. Structural Error & Void Orders

- Under *Williams*, judicial participation where the judge and close family are implicated is a **structural due-process violation**, not subject to harmless-error review.
- Under *Jenkins*, all orders entered with Silberman's participation after the filing of a sufficient motion are **void ab initio**.

7. Procedural Strength

- **Discovery Date:** April 15, 2025.
- Verified motion filed within 20 days, satisfying Rule 2.330(g) by analogy.
- Record supported by:
    - DOS reports (self-authenticating).
    - Affidavits (Siamas, Gleason, others).
    - Recusal Fact Matrix (Appendix C).
- *Livingston* requires these allegations be accepted as **true**, and the only test is whether they create a **well-founded fear of bias**.

Conclusion – Tab C

Judge Daniel H. Silberman's disqualification is **mandatory**. He is conflicted as a **victim**, a **material witness**, a **spouse of Judge Khouzam (also implicated)**, and a **parent of a child whose voter record was targeted**. These verified facts create a **well-founded fear of bias** under *Livingston*. **JEAC Op. 17-20** confirms that recusal is not optional when a judge or close relative is implicated. His continued participation is a **structural due-process violation**, rendering all orders **void ab initio**. Prohibition and reassignment are required.

Tab D – Judge Susan Rothstein-Youakim
Court: Second District Court of Appeal (2DCA)

Conflict Type(s):

- **Retention election stake:** fraudulent VBM ballots processed in Pinellas County directly impacted the outcome of her **2024 merit-retention election**.
- **Familial victim conflict:** DOS reports show fraudulent VBM requests for her **parents, Rita M. Rothstein and Arthur S. Rothstein**, both flagged "N" for no verified ID.

Governing Authorities

- **Canon 3E(1)(a), (d), Fla. Code Jud. Conduct** – disqualification mandatory if impartiality may reasonably be questioned or judge/close relative implicated.
- **Canon 2A** – avoid appearance of impropriety.
- **§ 38.02, Fla. Stat.** – disqualification required if judge or close relative is a material witness.
- **§ 38.10, Fla. Stat.** – affidavit of bias mandates reassignment.
- **Rule 2.330(e)(2), Fla. R. Gen. Prac. & Jud. Admin.** – disqualification required where close relatives have an interest.
- **Livingston v. State**, 441 So. 2d 1083 (Fla. 1983) – allegations deemed true; sufficiency = **well-founded fear of bias**.
- **Caperton v. A.T. Massey Coal Co.**, 556 U.S. 868 (2009) – due process violated where judge has personal stake.
- **Williams v. Pennsylvania**, 579 U.S. 1 (2016) – judge's personal/familial connection = structural error.
- **Jenkins v. Motorola, Inc.**, 911 So. 2d 196 (Fla. 3d DCA 2005) – rulings after sufficient disqualification are void.

- **JEAC Op. 17-20** – mandatory recusal when close relatives implicated.
- **State v. Smith**, 240 So. 2d 807 (Fla. 1970) – fundamental error when fairness destroyed.

Detailed Evidentiary Analysis

1. Factual Basis & Prima Facie Evidence (*Livingston*)

- **Retention election:** Pinellas SOE processed fraudulent VBM ballots in 2024 retention contests. These ballots directly affected the outcome of Judge Rothstein-Youakim's merit-retention election.
- **Parents' voter records:** DOS reports show **Rita M. Rothstein and Arthur S. Rothstein** listed with fraudulent VBM requests, flagged **"N" = no verified ID**.
- **Statutory violation:** These anomalies violated **§ 101.62(1)(b), Fla. Stat.**, which requires DL/SSN verification for ballot requests.
- **Protected voter issue:** As judicial family members, their records are confidential under **§ 97.0585, Fla. Stat.**, requiring insider override.
- **Felony implications:**
  - **§ 104.047(4)(a)** – unauthorized ballot requests.
  - **§ 104.011(1)** – false affirmations.
- **Self-Authentication:** DOS reports are official public records (§ 90.902(1)); corroborated by affidavits (Siamas, Gleason).

2. Familial Victim Conflict

- **JEAC Op. 17-20** mandates recusal where close relatives are implicated.
- Judge Rothstein-Youakim's **parents** were listed in DOS reports with fraudulent anomalies.
- This creates an independent **familial conflict**, reinforcing her disqualification beyond her personal retention election stake.

3. Retention Election Conflict

- Judge Rothstein-Youakim had a **direct personal stake** in her 2024 retention election.
- Fraudulent VBM activity in Pinellas County **directly influenced the result of whether she remained in office**.
- Under *Caperton* and *Livingston*, this creates a **well-founded fear of bias**.

4. Structural Error & Void Orders

- Participation despite these conflicts constitutes **structural error** under *Williams*.
- All rulings with her participation after a sufficient disqualification motion are **void ab initio** under *Jenkins*.

5. Fundamental Error

- Judge Rothstein-Youakim's participation despite her **direct personal stake in her 2024 retention election** and her **parents' records being implicated** constitutes not only structural error under *Williams*, but also **fundamental error under Florida law** (*State v. Smith*).

- The anomalies in Rita and Arthur Rothstein's records violated **§ 101.62(1)(b), Fla. Stat.**, triggering **§§ 38.02 and 38.10** as well as **Rule 2.330(e)(2)** and **JEAC Op. 17-20**.
- Proceeding before a judge whose own election outcome and close relatives were tied to the misconduct under litigation destroyed the fairness of the proceedings.
- Such error is **not subject to waiver** and independently requires reversal. All rulings are **void ab initio** under *Jenkins*.

Conclusion – Tab D

Judge Susan Rothstein-Youakim's disqualification is **mandatory**. Her **2024 retention election was directly impacted by fraudulent VBM ballots**, and her **parents, Rita and Arthur Rothstein, were listed in DOS reports with fraudulent anomalies in violation of § 101.62(1)(b), Fla. Stat.** Under Rule 2.330, §§ 38.02/38.10, *Livingston*, *Caperton*, and **JEAC Op. 17-20**, these verified facts create a **well-founded fear of bias**. Her continued participation is both a **structural due-process violation** and a **fundamental error under Florida law**, rendering all rulings **void ab initio**.

Tab E – Judge Darryl LaRose
Court: Second District Court of Appeal (2DCA)

Conflict Type(s):

- **Retention election stake:** fraudulent VBM ballots processed in Pinellas County directly impacted the outcome of his **2024 merit-retention election**.

Governing Authorities

- **Canon 3E(1)(a), Fla. Code Jud. Conduct** – disqualification mandatory where impartiality may reasonably be questioned.
- **Canon 2A** – judges must avoid even the appearance of impropriety.
- **§ 38.10, Fla. Stat.** – affidavit of bias requires reassignment.
- **Livingston v. State**, 441 So. 2d 1083 (Fla. 1983) – verified allegations deemed true; sufficiency = **well-founded fear of bias**.
- **Caperton v. A.T. Massey Coal Co.**, 556 U.S. 868 (2009) – due process violated where judge has personal stake.
- **Williams v. Pennsylvania**, 579 U.S. 1 (2016) – judge's personal involvement = structural error.
- **Jenkins v. Motorola, Inc.**, 911 So. 2d 196 (Fla. 3d DCA 2005) – rulings after sufficient disqualification motion are void.
- **State v. Smith**, 240 So. 2d 807 (Fla. 1970) – fundamental error arises when fairness of proceeding is destroyed.

Detailed Evidentiary Analysis

1. Factual Basis & Prima Facie Evidence (*Livingston*)

- **Retention election:** Fraudulent VBM ballots processed in Pinellas County in 2024 directly impacted judicial retention contests, including Judge LaRose's.
- His continuation in office depended on the integrity of the SOE system now under challenge.
- **Statutory violations:** fraudulent requests violated **§ 101.62(1)(b)** (ID verification requirement), **§ 104.047(4)(a)** (unauthorized requests), and **§ 104.011(1)** (false affirmations).
- **Affidavits:** Siamas and Gleason confirm such anomalies required insider override.
- **Self-Authentication:** DOS reports are official public records (§ 90.902(1)).

2. Retention Election Conflict

- Judge LaRose had a **direct personal stake** in his 2024 retention election.
- Fraudulent VBM activity directly affected the result of whether he remained in office.
- A **reasonable person** would fear that Judge LaRose might unconsciously:
    - **Minimize fraud** to preserve legitimacy of his election, or
    - **Disfavor Gleason** for exposing anomalies undermining his election.
- Under *Livingston*, these verified facts establish a **well-founded fear of bias**.

3. Structural Error & Void Orders

- Judge LaRose's participation despite his retention-election conflict constitutes **structural error** under *Williams*.
- All rulings with his participation after a sufficient disqualification motion are **void ab initio** under *Jenkins*.

4. Fundamental Error

- Judge LaRose's participation despite his **direct personal stake in his 2024 retention election** constitutes not only structural error under *Williams*, but also **fundamental error under Florida law** (*State v. Smith*).
- Because fraudulent VBM ballots directly impacted the outcome of his election, his impartiality was compromised at the foundation.
- Proceeding before such a conflicted judge destroyed the fairness of the proceeding and denied due process.
- Such error is **not subject to waiver**, and all rulings with his participation are **void ab initio** under *Jenkins*.

Conclusion – Tab E

Judge Darryl LaRose's disqualification is **mandatory**. His **2024 retention election was directly impacted by fraudulent VBM ballots**, creating a **direct personal stake** in the litigation. Verified DOS reports and affidavits establish a **well-founded fear of bias** under *Livingston*. His continued participation constitutes both a **structural error under federal due process** and a **fundamental error under Florida law**, rendering all rulings **void ab initio**. Prohibition and reassignment are required.

Tab F – Judge Matthew C. Black
Court: Second District Court of Appeal (2DCA)

Conflict Type(s):

- **Retention election stake:** fraudulent VBM ballots processed in Pinellas County directly impacted the outcome of his **2024 merit-retention election**.

Governing Authorities

- **Canon 3E(1)(a), Fla. Code Jud. Conduct** – disqualification mandatory where impartiality may reasonably be questioned.
- **Canon 2A** – judges must avoid even the appearance of impropriety.
- **§ 38.10, Fla. Stat.** – affidavit of bias requires reassignment.
- **Livingston v. State**, 441 So. 2d 1083 (Fla. 1983) – verified allegations deemed true; sufficiency = **well-founded fear of bias**.
- **Caperton v. A.T. Massey Coal Co.**, 556 U.S. 868 (2009) – due process violated where judge has personal stake.
- **Williams v. Pennsylvania**, 579 U.S. 1 (2016) – judge's personal involvement = structural error.
- **Jenkins v. Motorola, Inc.**, 911 So. 2d 196 (Fla. 3d DCA 2005) – post-disqualification rulings are void.
- **State v. Smith**, 240 So. 2d 807 (Fla. 1970) – fundamental error arises when fairness of proceeding is destroyed.

Detailed Evidentiary Analysis

1. Factual Basis & Prima Facie Evidence (*Livingston*)

- **Retention election:** Fraudulent VBM activity in Pinellas County directly impacted judicial retention contests in 2024, including Judge Black's.
- His continuation in office depended on the integrity of the very SOE system now under challenge.
- **Statutory violations:** fraudulent ballots implicated **§ 101.62(1)(b)** (failure to verify DL/SSN), **§ 104.047(4)(a)** (unauthorized requests), and **§ 104.011(1)** (false affirmations).
- **Affidavits:** Siamas and Gleason confirm insider override was required for anomalies of this nature.
- **Self-Authentication:** DOS reports are official public records under § 90.902(1).

2. Retention Election Conflict

- Judge Black had a **direct personal stake** in his 2024 retention election.
- Fraudulent VBM activity directly affected the outcome of whether he remained in office.
- A **reasonable person** would fear that Judge Black might unconsciously:
    - **Minimize evidence of fraud** to preserve legitimacy of his own election, or
    - **Disfavor Gleason** for raising challenges implicating his election outcome.
- Under *Livingston*, these verified facts establish a **well-founded fear of bias**.

3. Structural Error & Void Orders

- Judge Black's participation despite his election conflict constitutes **structural due-process error** (*Williams*).
- All rulings with his participation after a sufficient motion to disqualify are **void ab initio** (*Jenkins*).

4. Fundamental Error

- Judge Black's continued participation despite his **direct personal stake in his 2024 retention election** constitutes not only structural error under *Williams*, but also **fundamental error under Florida law** (*State v. Smith*).
- Because fraudulent VBM ballots directly affected his election outcome, his impartiality is compromised at the foundation.
- Proceeding before such a conflicted judge destroyed the fairness of the proceeding and denied due process.
- Such error is **not subject to waiver**, and all rulings with his participation are **void ab initio** under *Jenkins*.

Conclusion – Tab F

Judge Matthew C. Black's disqualification is **mandatory**. His **2024 retention election was directly impacted by fraudulent VBM ballots**, creating a **direct personal stake** in the litigation. Verified DOS reports and affidavits establish a **well-founded fear of bias** under *Livingston*. His participation is both a **structural error under federal due process** and a **fundamental error under Florida law**, rendering all orders **void ab initio**. Prohibition and reassignment are required.

Tab G – Judge Patricia Muscarella
Court: Sixth Judicial Circuit (Pinellas County) Conflict Type(s):

- **Victim of fraudulent VBM activity:** DOS records show unauthorized VBM requests in her name (June 23, 2024 & Sept. 9, 2024, both flagged "N" = no ID).
- **Protected voter anomaly:** as a judge, her data was shielded under § 97.0585, Fla. Stat.; such requests were procedurally impossible without insider override.
- **Material witness:** only she can testify to whether the requests were authorized.
- **Procedural bias:** failures in Gleason's trial (discovery rulings, sealing orders, reliance on defense counsel, disparate treatment of pro se litigant).
- **History of disqualification motions improperly denied:** two verified motions, supported by affidavits, were summarily rejected as "legally insufficient."

Governing Authorities

- **Rule 2.330(e), Fla. R. Gen. Prac. & Jud. Admin.** – disqualification for bias, interest, or when judge is a material witness.
- **§§ 38.02 & 38.10, Fla. Stat.** – mandatory disqualification when judge is a material witness or affidavit of bias is filed.
- **Canon 2A; Canon 3E(1)(a), (d)** – avoid appearance of impropriety; disqualification required for personal/familial conflicts.
- **Livingston v. State**, 441 So. 2d 1083 (Fla. 1983) – verified allegations deemed true; sufficiency = **well-founded fear of bias**.

- **Lightsey v. State**, 53 So. 3d 1093 (Fla. 1st DCA 2011) – material-witness judge must recuse.
- **Williams v. Pennsylvania**, 579 U.S. 1 (2016) – judge's personal involvement = structural error.
- **Jenkins v. Motorola, Inc.**, 911 So. 2d 196 (Fla. 3d DCA 2005) – post-disqualification orders are void ab initio.
- **JEAC Op. 18-13** – recusal required when judge has personal knowledge of disputed facts.
- **State v. Smith**, 240 So. 2d 807 (Fla. 1970) – fundamental error occurs when fairness of the proceeding is destroyed.

Detailed Evidentiary Analysis

1. Factual Basis & Prima Facie Evidence (*Livingston*)

- **DOS Reports:**
  - June 23, 2024 request: entered on a Sunday (SOE offices closed), flagged "N."
  - Sept. 9, 2024 duplicate: flagged "N," violating **Rule 1S-2.055(3)(d), Fla. Admin. Code** (duplicate requests prohibited).
  - **Both requests flagged "N" = no verified ID, violating § 101.62(1)(b), Fla. Stat., which requires a driver's license number or last four digits of the SSN for ballot requests.**
- **Protected voter anomaly:** her record was shielded under § 97.0585, Fla. Stat. Insider override was required for either entry.
- **Affidavit of John Siamas (April 2025):** confirmed such anomalies required insider override or fraud.
- **Felony implications:**

    - **§ 104.047(4)(a)** – unauthorized ballot requests.
    - **§ 104.011(1)** – false affirmations.
- **Self-Authentication:** DOS reports are official records under § 90.902(1); affidavits corroborate them.

2. Judge Muscarella as a Victim of Fraud

- Fraudulent VBM entries compromised her voter integrity, making her a **direct victim**.
- Creates a **direct interest in the litigation**.
- A **reasonably prudent person** would fear Judge Muscarella might unconsciously:
    - **Downplay fraud** to avoid personal embarrassment, or
    - **Disfavor Petitioner Gleason**, who exposed her anomalies.
- Under *Livingston*, these facts, deemed true, establish a **well-founded fear of bias**.

3. Judge Muscarella as a Material Witness

- She alone can testify whether she authorized either VBM request.
- She must explain how a Sunday entry occurred and why a duplicate appeared in September.
- This makes her a **material witness** under § 38.02 and Rule 2.330.
- *Lightsey* and JEAC Op. 18-13 confirm such judges must recuse.

4. Procedural Bias in Gleason's Trial

- Plaintiff alleged Judge Muscarella:
    - **Failed to rule** on discovery and judicial notice motions.
    - **Relied on defense counsel** for statutory interpretations (Exhibit G).
    - **Denied pro se rights** by forbidding recording of hearings.
    - **Improperly sealed exhibits** beyond necessity.
- These acts, individually and collectively, reinforce the appearance of bias.

5. History of Disqualification Motions and Improper Denials

- **Sept. 19, 2024 Verified Motion to Disqualify** – alleged discovery failures, reliance on defense counsel, pro se unfairness, and 2010 election conflict.
- **Order Denying (Sept. 19, 2024):** summarily rejected as "legally insufficient."
- **Oct. 21, 2024 Renewed Motion to Disqualify** – supported by Plaintiff's affidavit and **five sworn witness affidavits**, all attesting to bias.
- **Order Denying (Oct. 22, 2024):** again dismissed as "legally insufficient."

Livingston Application:
Both motions were facially sufficient. Under *Livingston*, facts must be taken as true; Judge Muscarella erred in dismissing them. Her refusal to step aside despite legally sufficient motions renders all subsequent rulings **void ab initio** under *Jenkins*.

6. Structural Error & Void Orders

- As a victim-witness judge, her participation is a **structural due-process violation** (*Williams*).
- All rulings after denial of sufficient disqualification motions are **void** (*Jenkins*).

7. Fundamental Error

- Under **State v. Smith**, fundamental error exists where fairness of the proceeding is destroyed.
- Judge Muscarella's refusal to recuse after multiple sufficient motions is not just structural error under *Williams*, but **fundamental error under Florida law**.
- Proceeding before a judge who is both a **victim of the fraud scheme** and a **material witness** deprived Petitioner of his due-process right to an impartial tribunal.
- Such error is **not subject to waiver** and independently requires reversal.

Conclusion – Tab G

Judge Patricia Muscarella's disqualification is **mandatory**. She is both a **victim** of fraudulent VBM anomalies and a **material witness**. Verified motions supported by multiple affidavits were improperly denied as "legally insufficient." Under *Livingston*, these allegations create a **well-founded fear of bias**. Her continued participation constitutes **structural error under federal law** and **fundamental error under Florida law**, rendering all orders **void ab initio**. Prohibition and reassignment are required.

Tab H – Judge Peter Ramsberger
Court: Sixth Judicial Circuit (Pinellas County)

Conflict Type(s):

- **Familial victim conflict:** DOS reports show fraudulent VBM requests for multiple members of Judge Ramsberger's family, all flagged **"N" = no ID**:
    - **Judge Thomas Ramsberger (son)** – protected voter.
    - **Angela M. Ramsberger (daughter-in-law)** – protected voter under § 97.0585, Fla. Stat.
    - **Kerry A. Ramsberger (close relative, not protected)**.
    - **Katherine A. Ramsberger (close relative, not protected)**.
    - **Kelsey D. Ramsberger (close relative, not protected)**.
- The entries for **Thomas and Angela**, as protected voters, could only have been made through insider override.
- The anomalies for **Kerry, Katherine, and Kelsey** demonstrate the breadth of fraud reaching the extended Ramsberger family.
- Collectively, these entries create a **direct family conflict of interest** under Rule 2.330(e)(2) and Canon 3E(1)(d).

Governing Authorities

- **Rule 2.330(e)(2), Fla. R. Gen. Prac. & Jud. Admin.** – disqualification required where a judge's close family member has an interest in the case.
- **§§ 38.02 & 38.10, Fla. Stat.** – mandatory disqualification for family witness conflicts or affidavits of bias.
- **Canon 2A, Canon 3E(1)(d), Fla. Code Jud. Conduct** – avoid appearance of impropriety; recusal required for family conflicts.

- **Livingston v. State**, 441 So. 2d 1083 (Fla. 1983) – verified allegations deemed true; sufficiency = **well-founded fear of bias**.
- **Williams v. Pennsylvania**, 579 U.S. 1 (2016) – judge's personal/familial connection = structural error.
- **Jenkins v. Motorola, Inc.**, 911 So. 2d 196 (Fla. 3d DCA 2005) – rulings entered after sufficient disqualification motion are void.
- **JEAC Op. 17-20** – recusal required when a judge's close relatives are implicated in disputed facts.
- **State v. Smith**, 240 So. 2d 807 (Fla. 1970) – fundamental error arises when fairness of proceeding is destroyed.

Detailed Evidentiary Analysis

1. Factual Basis & Prima Facie Evidence (*Livingston*)

- **DOS Reports** list fraudulent VBM requests for:
  - **Thomas Ramsberger (protected voter)** – flagged "N."
  - **Angela M. Ramsberger (protected voter)** – flagged "N."
  - **Kerry A. Ramsberger** – flagged "N."
  - **Katherine A. Ramsberger** – flagged "N."
  - **Kelsey D. Ramsberger** – flagged "N."
- **Statutory violation:** All requests flagged "N" = no verified ID, violating **§ 101.62(1)(b), Fla. Stat.**, which requires DL/SSN verification.
- **Protected voter issue:** Entries for Thomas and Angela required insider override, as their data is shielded under **§ 97.0585, Fla. Stat.**
- **Felony implications:**

    - **§ 104.047(4)(a)** – unauthorized requests.
    - **§ 104.011(1)** – false affirmations.
- **Self-Authentication:** DOS reports are official public records (§ 90.902(1)); affidavits (Siamas, Gleason) confirm authenticity.

2. Familial Victim Conflict

- **JEAC Op. 17-20** mandates recusal when close relatives are implicated.
- Judge Ramsberger's **son and daughter-in-law (protected voters)** were directly victimized, and multiple **other close relatives** appear in the DOS anomalies.
- These facts remove any discretion: disqualification is mandatory.

3. Appearance of Bias (*Livingston*)

- A **reasonably prudent person** would conclude that Judge Ramsberger cannot appear impartial where his **immediate and extended family** were victims of the fraud scheme.
- Under *Livingston*, these verified facts, deemed true, establish a **well-founded fear of bias**.

4. Structural Error & Void Orders

- Judge Ramsberger's participation despite these family conflicts constitutes **structural due-process error** under *Williams*.
- Under *Jenkins*, any rulings entered after a sufficient disqualification motion are **void ab initio**.

5. Fundamental Error

- Under **State v. Smith**, fundamental error exists where fairness of the proceeding is destroyed.
- Judge Ramsberger's participation in a case where his **son, daughter-in-law, and other close relatives were direct victims** is not only structural error under *Williams*, but also **fundamental error under Florida law**.
- Proceeding under such conditions deprived Petitioner of the right to an impartial tribunal — an error **not subject to waiver** and independently requiring reversal.

Conclusion – Tab H

Judge Peter Ramsberger's disqualification is **mandatory**. DOS reports prove fraudulent VBM requests were logged for his **son (Judge Thomas Ramsberger) and daughter-in-law Angela M. Ramsberger (both protected voters)**, as well as **Kerry A., Katherine A., and Kelsey D. Ramsberger**, all flagged "N" in violation of **§ 101.62(1)(b), Fla. Stat.** Under Rule 2.330, §§ 38.02/38.10, *Livingston*, and **JEAC Op. 17-20**, these verified facts create a **well-founded fear of bias**. His continued participation is both a **structural due-process violation** and a **fundamental error under Florida law**, rendering all orders **void ab initio**. Prohibition and reassignment are required.

Tab I – Chief Judge Shawn Crane

Conflict Type(s):

- **Assignment Authority Conflict:** Assigned Petitioner's cases to conflicted judges.
- **Presiding Judge Conflict:** Presided directly in case 24-003717-CI.
- **Staff Conflict:** Judicial assistant Louise Smith (protected voter) victimized by fraudulent VBM requests.
- **Administrative Misconduct:** Blocked grand jury investigation requests (200+ voters under §§ 104.42–104.43).
- **Statutory Neglect: 104.43 Grand juries; special investigation.**—The grand jury in any circuit shall, upon the request of any candidate or qualified voter, make a special investigation when it convenes during a campaign preceding any election day to determine whether there is any violation of the provisions of this code, and shall return indictments when sufficient ground is found.
- **Personal Knowledge of Material Facts:** Personally received 200+ sworn affidavits alleging election fraud by Julie Marcus and co-conspirators; his inaction despite mandatory duty creates direct personal knowledge of facts in dispute.

- Knowingly and intentionally delayed, concealed, preventing the communication of information about numerous felonies that affects the government entity they serve. Knowingly and intentionally obtaining a benefit for any person or causes unlawful harm to another.

Governing Authorities

- Canon 3E(1)(a), (d), Fla. Code Jud. Conduct.
- Canon 2A.
- §§ 38.02, 38.10, Fla. Stat.
- Rule 2.330(e)(2), (e)(4), Fla. R. Gen. Prac. & Jud. Admin.
- § 104.43, Fla. Stat. (Grand Juries: Special investigations).
- § 838.022, Fla. Stat. (Official Misconduct).
- Livingston v. State, 441 So. 2d 1083 (Fla. 1983).
- Williams v. Pennsylvania, 579 U.S. 1 (2016).
- Jenkins v. Motorola, Inc., 911 So. 2d 196 (Fla. 3d DCA 2005).
- State v. Smith, 240 So. 2d 807 (Fla. 1970).
- JEAC Op. 17-20.

Detailed Evidentiary Analysis

1. Assignment Authority Conflict:

- As Chief Judge, Crane assigned Petitioner's cases to judges already shown to be victims, material witnesses, or otherwise conflicted.

2. Presiding Judge Conflict:

- Crane himself presided in Case 24-003717-CI, despite conflicts.

3. Staff Conflict: – Judicial Assistant Louise Smith

DOS reports confirm Louise Smith, Crane's judicial assistant, had fraudulent VBM requests entered without ID verification.

Factual Basis & Prima Facie Evidence (*Livingston*)

- **DOS Reports:**
  - June 23, 2024 request: entered on a Sunday (SOE offices closed), flagged "N."
  - Sept. 9, 2024 duplicate: flagged "N."
  - **Both requests flagged "N" = no verified ID, violating § 101.62(1)(b), Fla. Stat., which requires a DL number or last four of SSN.**
- **Felony implications:**
  - **§ 104.047(4)(a)** – unauthorized ballot requests.
  - **§ 104.011(1)** – false affirmations.
- **Self-Authentication:** DOS reports are public records (§ 90.902(1)); affidavits corroborate them.

4. Administrative Misconduct – Grand Jury Requests

- Over 200 voters filed requests for a grand jury investigation into

election fraud.

- Crane failed to convene a grand jury investigation despite § 104.43's mandatory "shall convene" language.

5. Personal Knowledge of Material Facts – Affidavits

- Crane personally received over 200 sworn affidavits alleging election fraud by Julie Marcus and others.
- His inaction despite mandatory duty under § 104.43 gives him personal knowledge of material facts in dispute.
- Under Canon 3E(1)(a) and § 38.02, this constitutes an independent ground for mandatory disqualification.

Structural Error & Void Orders

- Crane's assignment authority, presiding role, personal knowledge of affidavits, and administrative neglect create structural error (Williams).
- Orders he entered, and those by conflicted judges he assigned cases to, are void ab initio (Jenkins).

Fundamental Error

- His participation destroyed the fairness of proceedings (Smith).

- Error is fundamental and non-waivable.

Conclusion – Tab I

Chief Judge Shawn Crane's disqualification is mandatory. His conflicts arise from:

1. Assignment of Petitioner's cases to conflicted judges.

2. Presiding personally in case 24-003717-CI.

3. Staff conflict (judicial assistant Louise Smith victimized).

4. Administrative misconduct (blocking 200+ grand jury requests despite statutory mandate).

5. Personal knowledge of disputed facts (receipt of 200+ sworn affidavits).

Under Canon 3E, §§ 38.02/38.10, Rule 2.330, and JEAC Op. 17-20, his continued participation constitutes structural error and fundamental error, rendering all rulings void ab initio.

Tab J – 2023 FLORIDA JUDICIAL COLLEGE GUIDE TO DISQUALIFICATION AND RECUSAL

2023 FLORIDA JUDICIAL COLLEGE
PHASE II – March 2023

Guide to Disqualification and Recusal

Guide to Disqualification Motions and Recusal

THE HONORABLE GARY P. FLOWER
COUNTY COURT JUDGE
DUVAL COUNTY

THE HONORABLE DANIELLE L. BREWER
CIRCUIT JUDGE
12TH CIRCUIT

MATERIALS CREATED AND UPDATED BY THE HONORABLE GARY P. FLOWER
AND UPDATED BY THE HONORABLE STEVEN P. DELUCA, THE HONORABLE KIMBERLY C. BONNER,
AND THE HONORABLE DANIELLE L. BREWER

~ UPDATED THROUGH FEBRUARY 2023

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Introduction to Disqualification and Recusal

The terms disqualification and recusal are not interchangeable. Disqualification involves a litigant moving to have a judge removed from a case. Recusal is the voluntary action of judges removing themselves from a case.

Every motion for disqualification asks the same fundamental question: whether the litigant has reasonable cause to believe that he will be treated unfairly by the court. "The question of disqualification focuses on those matters from which a litigant may reasonably question a judge's impartiality rather than the judge's perception of his ability to act fairly and impartially." *Livingston v. State*, 441 So. 2d 1083, 1086 (Fla. 1983).

Relevant Statutes, Rule and Canons

Statutes. Section 38.02, Fla. Stat., creates the substantive right to request disqualification of a trial judge based on the judge's familial relationship with a party or interested person or if there is the necessity of calling the judge as a material witness. Section 38.10, Fla. Stat., gives litigants the substantive right to request disqualification of a trial judge for bias.

Rules. The procedures for disqualification are governed exclusively by Rule 2.330 of the Florida Rules of General Practice and Judicial Administration (formerly called the Florida Rules of Judicial Administration). These rules only apply to trial judges acting alone in a trial or appellate proceeding. The supreme court made several substantive amendments to these Rules as of March 1, 2021; therefore, some of the cases cited herein may refer to subsections that have since been re numbered.

Canons. Canons 2 and 3 also set forth the ethical considerations that mandate disqualification. The Canons, however, do not provide the procedural mechanism for removing a trial judge; they provide the substantive legal basis for such a motion.

Summary Of Steps: Stop, Drop, And Rule

Stop
Stop everything on the case when you are served with the motion and do not enter any new rulings on other issues

Drop
Drop everything and review motion for procedural and legal sufficiency within four corners of document

Rule
Prepare a simple written order granting or denying the motion no later than 30 days of service

STEPS IN THE ANALYSIS OF A DISQUALIFICATION MOTION

Make a determination whether the motion for disqualification is an initial or successive motion. Each type of motion has unique standards the movant must meet and restrictions on the kind of order that can be entered by the court.

> *NOTE*: The clock is ticking: The current rule specifically states that the judge "shall take action on the motion immediately but no later than thirty days after the service." Motions are *automatically deemed granted* if the court fails to enter an order within thirty days after service. Fla. R. Gen. Prac. & Judicial Admin. 2.330(g)

PROCEDURAL RULES ON DISQUALIFICATION:

The Florida Rules of General Practice and Judicial Administration contain the requirements a litigant must meet in order to disqualify the trial judge and the applicable time frames in which to file the motion. They also require the judge to rule

promptly. The Rules distinguish between a litigant's first, or initial motion to disqualify, and a successive motion(s) to disqualify a different judge in the same case.

Disqualification motions can be denied based on procedural insufficiencies, even if the factual allegations are otherwise sufficient. (Note: 2021 rule amendments are highlighted in bold).

Initial (i.e. "First Bite at the Apple") Motions for Disqualification.

1. The requirements of Rule 2.330, Fla. R. Gen. Prac. & Jud. Admin:

> Motions must be in writing.[1] Rule 2.330(c)(1), Fla. R. Gen. Prac. & Jud. Admin.
>
> Allege with specificity the facts and reasons as grounds for disqualification "**and identify the precise date when the facts constituting the grounds for the motion were discovered by the party or the party's counsel, whichever is earlier.**" Rule 2.330(c)(2), Fla. R. Gen. Prac. & Jud. Admin.
>
> Parties have **20** days from the date of discovery to file and promptly serve the motion, or it is untimely. Rule 2.330(g), Fla. R. Gen. Prac. & Jud. Admin.
>
> Be sworn to **or affirmed** by a party by signing the motion by **attaching** a separate affidavit. Rule 2.330(c)(3), Fla. R. Gen. Prac. & Jud. Admin.
>
> Include the dates of all previously granted motions to disqualify filed under this rule in the case and the dates of the orders granting those motions. Rule 2.330 (c) (4), Fla. R. Gen Prac. & Jud. Admin.
>
> **Include a separate certification by the attorney for the party, if any, that the motion and client's statements are made in good faith.** Rule 2.330 (c) (5), Fla. R. Gen Prac. & Jud. Admin.
>
> Service: "**In addition to filing with the clerk, the movant shall promptly serve a copy of the motion on the subject judge as set forth in rule 2.516."** Rule 2.330 (d), Fla. R. Gen Prac. & Jud. Admin.[2]

[1] If an oral motion for disqualification is made during a hearing, it is an abuse of discretion by the court to deny a motion for continuance to allow a written motion to be prepared. *See Tyler v. State*, 816 So. 2d 755 (Fla. 4th DCA 2002) citing to *Reynolds v. State*, 568 So. 2d 76, 78 (Fla. 1st DCA 1990).

[2] This rule requires service via e-mail or regular mail with a certificate of service. Previously, this section applied the Florida Rules of Civil Procedure service provisions.

Grounds: Rule 2.330 (e) (1-4), Fla. R. Gen. Prac. & Jud. Admin., requires that a motion to disqualify shall set forth all specific and material facts upon which the judge's impartiality might reasonably be questioned, including but not limited to the following circumstances: [3]

1) The party reasonably fears that he or she will not receive a fair trial or hearing because of a specifically described prejudice or bias of the judge;
2) The judge, the judge's spouse or domestic partner, or a person within the third degree of relationship to either or them, or the spouse or domestic partner of such a person has more than a de minimus economic interest in the matter, is a lawyer in the proceeding, has more than a de minimus interest that could be substantially affected by the proceeding; or is likely to be a material witness or expert;
3) The judge served as a lawyer or lower court judge in the matter or a lawyer with whom the judge previously practiced law served during such association as a lawyer in the matter; or
4) The judge has prior personal knowledge of or bias regarding disputed evidentiary facts concerning the proceeding.

2. If the motion is procedurally insufficient:

The court may deny a procedurally insufficient motion even if the facts would otherwise be sufficient. The court should merely deny the motion as legally insufficient without further comment.

Appellate review of an initial motion for disqualification is a pure question of law subject to a de novo standard of review. *Mansfield v. State*, 911 So. 2d 1160 (Fla. 2005). Note the recent rule amendments require the movant to state the precise date when the grounds for disqualification were discovered. Questions of timeliness of the motion require a factual determination making that issue subject to the substantial, competent evidence standard of review under case law interpreting the former version of the rule. *Amato v. Winn Dixie Stores*, 810 So. 2d 979 (Fla.1st DCA 2002).

3. **If the motion is procedurally sufficient, determining legal sufficiency is the next step.**

a. The allegations must meet an objectively reasonable standard. *Hayslip v. Douglas*, 400 So. 2d. 553 (Fla. 4th DCA 1981)(whether the facts alleged would prompt a reasonably prudent person to fear that he could not get a fair and impartial trial).

b. **If the motion is legally sufficient, the judge shall immediately enter an order granting the disqualification and proceed no further in the**

[3] **This section is new in its entirety.**

action. Such an order does not constitute an acknowledgement that the allegations are true. Rule 2.330(h), Fla. R. Gen. Prac. & Jud. Admin.

c. The judge should not elaborate on the reasons for granting or denying the motion, nor should the court take issue with or otherwise address the facts alleged, no matter how spurious or inaccurate. Rule 2.330(h), Fla. R. Gen. Prac. & Jud. Admin.[4]

NOTE: Once a motion to disqualify is granted, even if granted in error, the court loses jurisdiction. Any subsequent orders by the disqualified judge are void. *Jenkins v. Motorola, Inc.*, 911 So. 2d 196 (Fla. 3d DCA 2005).

Note: Most motions filed will involve an allegation of reasonable fear of bias under Rule 2.330 (e)(1), Fla. R. Gen. Prac. & Jud. Admin., and §38.10, Fla. Stat.

4. **Successive(i.e. "Second Bite at the Apple") Motions for Disqualification.**

As with initial motions, successive motions must meet all of the procedural requirements such as being properly attested, timely, and in writing. However, successive motions for disqualification filed by the same party must meet a stricter, subjective, standard as it relates to perceived bias. *Greenfield v. Northcutt*, 22 So. 3d 849 (Fla. 3d DCA 2009). Successive judges can only be disqualified if there is a finding that they cannot, in fact, maintain impartiality. *Id.* Unlike initial motions for disqualification, successive judges may comment on the truth or falsity of the allegations. *Id.*, Rule 2.330(i), Fla. R. Gen. Prac. & Jud. Admin. This rule applies only to successor judges and not to successive *motions* to disqualify the *same* judge. *J & J Indus. v. Carpet Showcase*, 723 So. 2d 281 (Fla. 2d DCA 1998).

The 2021 amendments to the Rule also made a small, but important, change in terminology. The Rule now states that a successor judge "cannot" be disqualified unless he or she rules that they are in fact not fair or impartial.

Successive motions for disqualification are reviewed under an abuse of discretion standard. *King v. State*, 840 So. 2d 1047 (Fla. 2003); *Quince v. State*, 732 So. 2d 1059 (Fla. 1999); Rule 2.330(i), Fla. R. Gen. Prac. & Jud. Admin.

[4] *See M.D. Parker Associates, Inc. v. Connor*, 339 So. 3d 375 (Fla. 4th DCA 2022) (Ciklin, J., dissenting); *see also, Wagner v. State*, 342 So. 3d 712 (Fla. 2d DCA 2022).

5. **NEW** 2021 amendments to the Rule added a provision that prevents parties from creating a conflict by retaining substitute or additional counsel. This section provides that:

"Upon the addition of new substitute counsel or additional counsel in a case, the party represented by such newly appearing counsel is prohibited from filing a motion for disqualification of the judge based upon the new attorney's involvement in the case. This subdivision shall not apply, however, to a motion to disqualify a successor judge who was not presiding at the time of the new attorney's first appearance in the case." Rule 2.330(f), Fla. R. Gen. Prac. & Jud. Admin.

STATUTORY BASIS FOR DISQUALIFICATION:

The two statutory provisions dealing with disqualification are §38.02, Fla. Stat., and §38.10, Fla. Stat. Section 38.02, Fla. Stat., pertains to mandatory disqualification based on familial or witness relationship and is the statutory counterpart to Rule 2.330 (e)(2-4), Fla. R. Gen. Prac. & Jud. Admin. Section 38.10, Fla. Stat. pertains to disqualification based upon a reasonable concern as to the judge's bias and is the statutory counterpart to Rule 2.330 (e)(1), Fla. R. Gen. Prac. & Jud. Admin.

Section 38.02, Fla. Stat. (Familial/Financial Relationships):

Judge May Comment on the Allegations

If a party seeks to disqualify the judge based on § 38.02, Fla. Stat., they may file a suggestion of recusal. The judge may require the filing in the cause of affidavits touching the truth or falsity of such suggestion. **The judge may then comment on and determine the truth or falsity of the suggestion.** If the judge finds that the suggestion is false, they shall enter the order so stating and declaring themself to be qualified in the cause. A party must file the suggestion within 30 days of learning the information at issue or else the issue is deemed waived. **NOTE**: This deadline differs from the Rule in that the Rule provides a litigant 20 days to file a motion to disqualify after discovering the factual basis. Case law indicates that procedural rules govern the process of disqualification whereas the statute confers the substantive right to disqualify; therefore, the requirements of the Rule control. *E.g. Livingston v. State*, 441 So. 2d 1083 (Fla. 1984)

Section 38.02, Fla. Stat., requires the following:

- If the truth of the suggestion appears in the record, the judge should enter an order stating the grounds of the suggestion, with a declaration of disqualification from the case.

- If the truth of the suggestion does not appear in the record, the judge may order the filing of affidavits touching the truth or falsity of such suggestion.

- If the judge finds that the suggestion is true, he or she shall forthwith enter an order reciting the ground of his or her disqualification and declaring himself or herself disqualified in the cause; or

- If the judge finds that the suggestion is false, he or she shall forthwith enter the order so reciting the falsity and declaring himself or herself to be qualified in the cause.

Section 38.10, Fla. Stat. (Bias):

This provision states:

Whenever a party to any action or proceeding makes and files an affidavit stating fear that he or she will not receive a fair trial in the court where the suit is pending on account of the prejudice of the judge of that court against the applicant or in favor of the adverse party, the judge shall proceed no further, but another judge shall be designated in the manner prescribed by the laws of this state for the substitution of judges for the trial of causes in which the presiding judge is disqualified. Every such affidavit shall state the facts and the reasons for the belief that any such bias or prejudice exists and shall be accompanied by a certificate of counsel of record that such affidavit and application are made in good faith. However, when any party to any action has suggested the disqualification of a trial judge and an order has been made admitting the disqualification of such judge and another judge has been assigned and transferred to act in lieu of the judge so held to be disqualified, the judge so assigned and transferred is not disqualified on account of alleged prejudice against the party making the suggestion in the first instance, or in favor of the adverse party, unless such judge admits and holds that it is then a fact that he or she does not stand fair and impartial between the parties. If such judge holds, rules, and adjudges that he or she does stand fair and impartial as between the parties and their respective interests, he or she shall cause such ruling to be entered on the minutes of the court and shall proceed to preside as judge in the pending cause. The ruling of such judge may be assigned as error and may be reviewed as are other rulings of the trial court.

Distinction between § 38.02, Fla. Stat., and § 38.10, Fla. Stat.

The First District Court of Appeal summed up the differences in the treatment of the two kinds of motions: "Section 38.02 contemplates that the judge will determine the truth of the suggestion to disqualify. This is in contrast to a motion for disqualification for prejudice under section 38.10 where the judge may not pass on the truth of the allegations." *Douglass v. Douglas*, 633 So. 2d 1166 (Fla. 1st DCA 1994).

WHO GETS AN ADVERSE RULING "DO-OVER?"

Successor Judges. Orders entered by a disqualified judge are voidable, but not void as a matter of right. *See Schlesinger v. Chemical Bank*, 707 So. 2d 868 (Fla. 4th DCA 1998). If you are the judge assigned a case after a colleague is disqualified, the parties may file motions for reconsideration of previous factual or legal rulings made by the disqualified judge. Rule 2.330(j), Fla. R. Gen. Prac. & Jud. Admin. "The purpose of reconsideration by a successor judge of the original judge's orders after recusal is to remove the taint of prejudice where rulings might be perceived as so tainted; it should not be used merely to obtain a second bite at the apple with respect to prior judicial rulings." *Rath v. Network Marketing, L.C.*, 944 So.2d 485 (Fla. 4th DCA 2006), rehearing denied, review denied 958 So. 2d 920; *see also, Ogenovic v. Giannone*, 184 So.3d 1135 (Fla. 4th DCA 2015) (In determining whether to reconsider or vacate the rulings of a disqualified judge, the successor judge must consider whether the rulings work an injustice on the party as well as the effect of reconsideration of a multitude of rulings on the administration of justice.).

Unless there is good cause shown, all reconsideration motions must be filed within **30** days of the date of the disqualification order. *See Weiss v. Berkett*, 907 So. 2d 1181 (Fla. 3d DCA 2005) (appellant not entitled to reversal of the denied reconsideration motion as the motion was untimely filed).

NOTE: Section 38.07, Fla. Stat., specifically addresses a party's right to rehearing on prior orders of a disqualified judge:

"When orders have been entered in any cause by a judge prior to the entry of any order of disqualification under s. 38.02 or s. 38.05, any party to the cause may, within 30 days after the filing in the cause of the order of the chief judge of the circuit or the Chief Justice of the Supreme Court, as provided for in s. 38.09, petition the judge so designated for a reconsideration of the orders entered by the disqualified judge prior to the date of the entry of the order of disqualification. Such a petition shall set forth with particularity the matters of law or fact to be relied upon as grounds for the modification or vacation of the orders. Such a petition shall be granted as a matter of right."

NOTE: This right *only* applies if the disqualification was mandatory due to the judge's party or witness status, or familial relationship with a party or attorney under § 38.02, Fla. Stat. Attorneys may incorrectly cite this statute as blanket authority for a "mandatory" rehearing when the prior judge was actually disqualified for bias and not under the provisions in § 38.02, Fla. Stat.

Section 38.02, Fla. Stat., requires disqualification due to the judge or a person related to the judge, being a party in the case, or interested in the outcome; when the judge is related to an attorney of record, or is a material witness in the case. Section 38.05, Fla.

Stat., states that a judge may disqualify himself or herself where any of the grounds for a disqualification named in § 38.02, Fla. Stat., exist.

*Therefore, litigants are NOT entitled to a rehearing (as a matter of right) based on a disqualification under § 38.10, Fla. Stat. (perception of bias or prejudice).

When to Recuse Yourself from a Case

Investigate early any questions that may arise and recuse yourself early using the Canons as a guide to determine 1) whether it is mandatory or 2) whether it is appropriate given the circumstances. Ask yourself questions and honestly evaluate the answers.

Some questions to ask:

Do you have personal knowledge of disputed evidentiary facts concerning the proceeding?

Did you serve as a lawyer or lower court judge in the matter or did a law partner you practiced with serve on the case?

Do you have a personal bias or prejudice concerning a party, a witness, or a party's lawyer that may affect your objective decision making?

Do you or any of your family members have an economic interest or substantial stake in the outcome of the case?

Are some of your family members parties to the case? Is one of the lawyers a family member?

Did a lawyer or party help your judicial campaign? Did they help your opponents' campaign?

Is a lawyer your former opponent or potentially a future opponent in a judicial campaign?

Is there an objective appearance of impropriety if you preside over the case?

DUTY TO DISCLOSE VS. DUTY TO DISQUALIFY

The duty to disclose is broader than the duty to disqualify. Disclosure should always be on the record or in writing. The commentary to Canon 3E(1) states that a judge should disclose on the record information that the judge believes the parties or their lawyers might consider relevant to the question of disqualification, even if the judge believes there is not a real basis for disqualification.

1. The commentary to Canon 3E(1) states, if a judge makes a disclosure, it is not necessarily a basis for disqualification.

2. Pre 1995, there was a presumption that if a matter was important enough to require disclosure, it would constitute a sufficient factual basis to support a motion to disqualify under Rule 2.330 (former 2.160), Fla. R. Gen. Prac. & Jud. Admin. *See, W.I. v. State*, 696 So. 2d 457 (Fla. 4th DCA 1997) (Judge not required to disqualify upon disclosure that she had a friendship with juvenile's caseworker).

Consider what your course of action will be if you disclose information that you do not think requires disqualification or recusal, but a party moves to disqualify you nonetheless. [5]

Parties May Waive Their Right to Disqualify: "REMITTAL"

CANON 3F, FLA. CODE OF JUD. CONDUCT

REMITTAL: A judge disqualified by the terms of Canon 3E may disclose on the record the basis of the judge's disqualification and may ask the parties and their lawyers to consider, out of the presence of the judge, whether to waive disqualification. If following disclosure of any basis for disqualification other than personal bias or prejudice concerning a party, the parties and lawyers, without participation by the judge, all agree the judge should not be disqualified, and the judge is then willing to participate, the judge may participate in the proceeding. The agreement shall be incorporated in the record of the proceeding. Canon 3F, Fla. Code Jud. Conduct.

As a practical matter a judge may wish to have all parties and their lawyers sign the remittal agreement although the commentary indicates that parties may act through counsel if counsel represents on the record that the party has been consulted and consents. Canon 3F, Fla. Code Jud. Conduct, Commentary.

[5] *See In re Frank*, 753 So. 2d. 1228 (Fla. 2000); *see, also,* Fla. JEAC-Op. 12-02 ("Our Supreme Court has made clear that different standards should govern for disqualification and disclosure.").

Case Law

Summaries of Relevant Case Law

Many reasons exist as to why judges should grant a disqualification motion or recuse themselves from a case. There are an equal or greater number of frivolous reasons offered as a basis for disqualification that are used as a delay tactic or negotiation tool.

ISSUE:

Motion not in writing

A motion for disqualification must be in writing. The court must afford a party the opportunity to put the motion in writing. Ore tenus motions cannot suffice. *Rogers v. State*, 630 So. 2d 513 (Fla. 1993). Ore tenus motion during trial denied on the record and attorney never asked court for continuance to file a written motion. *Forrest v. State*, 904 So. 2d 629 (Fla. 4th DCA 2005).

Denial of motion proper as attorney did not file a written motion following the ore tenus motion to "recuse" during a hearing. *Migliore v. Migliore*, 792 So. 2d 1276 (Fla. 4th DCA 2001).

Unsworn/Inadequate oath/Insufficient or missing affidavit

The motion failed to include appellant's sworn signature or proper affidavit/sworn statement of facts. *Santisteban v. State*, 72 So. 3d 187 (Fla. 4th DCA 2011); *Hip Health Plan of Fla., Inc. v. Griffin*, 757 So. 2d 1272 (Fla. 4th DCA 2000).

No attorney certificate of good faith

Santisteban v. State, 72 So. 3d 187 (Fla. 4th DCA 2011). Reversed and remanded for resentencing on other grounds. The motion failed to include the attorney's separate certification that the motion and the client's statements were made in good faith.

Berkowitz v. Rieser, 625 So. 2d 971 (Fla. 2d DCA 1993). The motion was legally insufficient because it did not contain a certificate of good faith.

Untimely/Failure to serve court with motion

Harrison v. Johnson, 934 So. 2d 563 (Fla. 1st DCA 2006). The 30 day clock to enter a ruling does not begin to run until the moving party served the judge with a copy of the motion.

People Against Tax Revenue Mismanagement v. Reynolds, 571 So. 2d 493 (Fla. 1st DCA 1990). "If plaintiffs believed the judge assigned to their case was not impartial, they should have thoroughly and promptly investigated the grounds for disqualification and presented them all in a timely motion" rather than piecemeal.

Marquez v. State, 11 So. 3d 975 (Fla. 3d DCA 2009). Because the defendant failed to include a certificate of service reflecting service on the trial judge, the petition for writ of prohibition had to be denied.

Inphynet Contracting Services, Inc. v. Soria, 37 So. 3d 299 (Fla. 4th DCA 2010). Filing a motion to disqualify within 10 days of becoming "convinced" the judge is biased does not comply with the law. Incidents occurring over several years does not create a reasonable fear of bias unless those incidents just became known to the movant. Exaggeration and innuendo will not support a motion to disqualify.

Hendrick v. State, 6 So. 3d 688 (Fla. 4th DCA 2009). The defendant never served the trial judge with any of the motions for disqualification filed. Ergo, the 30 day time limit did not apply.

Carter v. Howey, 707 So. 2d 906 (Fla. 5th DCA 1998). The motion did not identify dates of alleged improper statements made by the judge at several pretrial hearings and the record showed the last pretrial hearing was conducted 31 days prior to the filing of the motion to disqualify.

Time Warner Entertainment Co. v. Baker, 647 So. 2d 1070 (Fla. 5th DCA 1994). Denial of the motion proper because it was filed more than one month after the moving party discovered the supporting ground.

What are Sufficient facts?

Attorney supported judge/judge's opponent during campaign

Zaias v. Kaye, 643 So. 2d 687 (Fla. 3d DCA 1994). Substantial participation in campaign may require recusal, whereas financial contributions or limited support may not.

Neiman-Marcus Group, Inc. v. Robinson, 829 So. 2d 967 (Fla. 4th DCA 2002). Disqualification required where attorney served as treasurer for judge's recent re-election campaign. *[NOTE: Even appellate courts use the terms disqualification and recusal interchangeably. Recusal is the correct term in this case.]*

MacKenzie v. Super Kids Bargain Store, Inc., 565 So. 2d 1332 (Fla. 1990). The fact that an attorney made a $500 contribution to the judge's political campaign does not, in itself, require disqualification—writ of prohibition granted on other grounds—judge impermissibly commented on the veracity of the allegations.

Oak Casualty Ins. v. Travelers Ins. Co., 750 So. 2d 704 (Fla. 3d DCA 2000). The court held that an allegation that the opposing counsel was a member of the judicial nominating commission from which the judge sought nomination was not sufficient to warrant disqualification.

E.I. DuPont de Nemours & Co., Inc., v. Aquamar et al., 24 So. 3d 585 (Fla. 4th DCA 2009). Writ of Prohibition denied. Statutorily permitted campaign contributions to the judge by the opposing law firm (totaling $4650) did not create an objective fear of bias.

Judicial Ethics Advisory Committee Opinion No. 2007-17, Issued November 15, 2007. "Whether a judge should disclose to the state when a criminal defense attorney appearing before the judge is currently on the judge's campaign committee. **ANSWER**: Yes.

Whether a judge should recuse himself or herself when a criminal defense attorney appearing before the judge is currently on the judge's campaign committee. **ANSWER**: Not necessarily."

Dell v. Dell, 829 So. 2d 969 (Fla. 4th DCA 2002). The non-moving party's attorney was one of six committee members actively campaigning for the judge's re-election (distinguished from endorsement). The more substantial and contemporaneous involvement of the attorney required the court's recusal.

Caleffe v. Vitale, 488 So. 2d 627 (Fla. 4th DCA 1986). Attorney appearing before the judge while actively managing judge's reelection campaign necessitated recusal.

Caperton v. Massey Coal Co., Inc., 556 U.S. 868, 129 S. Ct. 2252 (2009). During the pendency of an appeal from a $50 million verdict, an election of the supreme court judges ensued. A party contributed over $3 million to the political organization supporting one of the candidates, who unseated the incumbent by a narrow margin after exponentially outspending all other opponents—the bulk of those funds coming directly from the party to the appeal. The U.S. Supreme Court concluded "there is a serious risk of actual bias-based on objective and reasonable perceptions-when a person with a personal stake in a particular case had a significant and disproportionate

influence in placing the judge on the case by raising funds or directing the judge's election campaign when the case was pending or imminent." *Id.* at 2263-4.

Cini v. Cabezas, 343 So. 3d 1282 (Fla. 3d DCA 2022). Allegations of opposing counsel's law firm co-hosting fundraiser for judge during re-election campaign did not require disqualification of the judge.

Personal bias

Aberdeen Property Owners Assoc., Inc., v. Bristol Lakes Homeowners Assoc., Inc., 8 So. 3d 469 (Fla. 4th DCA 2009). Writ of Prohibition granted. The movant discovered the trial judge had actively voiced opposition in the judge's own personal homeowner's association dispute. The facts of movant's lawsuit were substantially similar to those involving the trial judge and his association. Disqualification became necessary since a reasonably prudent individual could fear the trial court's own personal bias would interfere in the proceedings.

Kersaint v. State, 15 So. 3d 41 (Fla. 3d DCA 2009). The appellate court granted the appellant's petition for writ of prohibition finding the original motion should have been granted. Before the sentencing hearing, the trial judge ordered the presentence investigation. Prior to the investigation, the trial judge inquired about defendant's score for sentencing. The defendant's score placed him in the non-state prison category or less than 365 days incarceration. The trial judge then stated he wanted the defendant to serve at least four years in prison and refused to consider time served of two years awaiting trial. These statements indicated a reasonably objective fear that defendant would not receive an unbiased sentence from the trial judge.

Colarusso v. Colarusso, 20 So. 3d 985 (Fla. 3d DCA 2009). Writ of Prohibition granted. The trial court's expression of negative views of the petitioner's behaviors during the dissolution of marriage met the objective standard requiring disqualification.

Blake v. Waks, 11 So. 3d 976 (Fla. 3d DCA 2009). Writ of Prohibition granted. The trial court's statement that it could not trust the petitioner to distribute the estate to the principals had no basis in the record. As such, disqualification was necessary.

Miami Dade College v. Turnberry Invs., 979 So. 2d 1211 (Fla. 3d DCA 2008). Writ of Prohibition granted. The trial court's exchanges on the record with counsel and various statements that the movant would financially suffer from litigation were sufficient to require disqualification.

NRD Invs., Inc. v. Velazquez, 965 So. 2d 304, 305 (Fla. 3d DCA 2007). Writ of Prohibition granted. The trial court expressed displeasure with the case and decided it was willing to enter a final judgment against the plaintiff early on in the case. The totality of the record evidenced a legally sufficient fear of partiality against the movant.

Personal Conduct of the Judge

Moskowitz v. Moskowitz, 998 So. 2d 660 (Fla. 4th DCA 2009). The parties were engaged in a contentious divorce that included allegations of drug use by the mother. In between trial days, the police arrested the judge in a local park for possession of marijuana. The trial court denied the husband's motion for disqualification. The motion should have been granted because the movant held an objectively reasonable fear of bias that the judge would not consider wife's drug use in its decisions, when the same judge had simultaneously pending drug possession charges.

Williams v. Balch, 897 So. 2d 498 (Fla. 4th DCA 2005). Writ of Prohibition granted. Trial court's comments and questions about parties' now married and pregnant 14 year old daughter demonstrated a shift in roles from neutral arbitrator towards advocate for the father.

J.E.A.C. Op. 2023-1, February 1, 2023. Civil judge who presides over insurance-related cases and who filed an insurance claim following Hurricane Michael should 1) disclose to all insurance-related litigants in their division of the judge's filing of a hurricane-related insurance claim; and 2) recuse themselves from any cases involving the same insurance company with whom the judge's claim is pending. If the judge's claim settles, there should be disclosure of the existence of the insurance claim and its settlement for a reasonable period of time after its occurrence due to the direct dealings between the judge and the insurance company. If the judge is represented by an attorney, and that attorney comes before the judge on either a contested or uncontested matter, the judge must automatically recuse himself or herself for a reasonable period of time after the representation ends.

Interaction with Judicial Staff

Alleged animosity between judicial assistant and one of attorney's employees insufficient for disqualification. *Nudel v. Flagstar Bank, FSB*, 52 So. 3d 692 (Fla. 2010). *Leone v. F.J.M. Constr*. 911 So. 2d 1285 (Fla. 1st DCA 2005)

J.A.'s notification to pro se litigants that they were prohibited from any further contact whatsoever with the judge or his staff was sufficient to warrant disqualification. *Madura v. Turosienski*, 901 So. 2d 396 (Fla. 2d DCA 2005)

Derogatory Comments about counsel/parties

Marshall v. Bookstein, 789 So. 2d 455 (Fla. 4th DCA 2001). Disqualification should have been granted where Court expressed its displeasure with trial counsel during the morning motion calendar "angrily denouncing their 'tactics' and deriding them as substandard Miami lawyers who 'may get away with this in Miami but not up here'."

Pugliese v. Deluca, 207 So. 3d 974 (Fla. 4th DCA 2016). Judge referring to litigants as "our Italian folks" was unnecessary and improper, however, it was *not* legally sufficient to base the motion to disqualify on that comment alone.

Cannon v. U.S. Bank Nat. Ass'n, 171 So.3d 133 (Fla. 4th DCA 2015). The level of animosity in between the judge and the petitioner's lawyer based upon the facts in the motion, which are not merely based upon adverse rulings, is sufficient to create an objectively reasonable fear by petitioners that the judge is so biased against their attorney as to require his disqualification.

Prior Orders of Disqualification Entered

Shands Teaching Hospital & Clinics, Inc. v. Samuel, et al., 926 So. 2d 441 (Fla. 1st DCA 2006). Writ of Prohibition granted. Trial court erred in denying motion for disqualification in all cases involving Shands. During a trial, the court commented he believed Shands employed questionable litigation tactics in all their cases, not just the case at trial. The court granted Shands's motion to disqualify in the case at trial expressly finding the motion was legally sufficient. The court denied Shands's disqualification motions in other cases pending before the court. Disqualification was necessary in all cases because the court expressly stated his concerns spanned all cases involving Shands.

Walls v. State, 910 So. 2d 432 (Fla. 4th DCA 2005). When the court feels it is necessary to recuse himself from an attorney's case because of friendship with the attorney then he should do so in all, not just some, cases. "We think the same holds as true for adversarial relationships as it does for friendships." *Id.* at 433.

Walls v. State, 910 So. 2d 432 (Fla. 4th DCA 2005). Writ of Prohibition granted. Trial court erred in denying motion for disqualification. The judge granted a disqualification motion involving trial counsel in an unrelated case. Within 10 days of the disqualification, trial counsel filed the same motion in the instant case citing to the acrimony between court and counsel and the court's previous disqualification in another case. The court denied the motion. Given what prompted the first disqualification, and that the motions were similar, the court should have granted the motion given that the bias surely existed just a few days after the first order.

Assistance provided to attorney/party during a hearing ("Stay in Your lane")

Seago v. State, 23 So. 3d 1269 (Fla. 2d DCA 2010). Writ of Prohibition granted. It is the duty of trial counsel, not the court, to use a witness's deposition to refresh recollection or impeachment. "By intentionally ignoring the opportunities that would have operated to brake its inquiry, the trial court was able to 'make sure that this [was] the right witness that ha[d] given a deposition.' However, that duty rested with respective trial counsel, not with the trial court. The latter's force of inquiry was an improper entry into the fray." *Id.* at 1271.

Wright v. Wright, 260 So. 3rd 494 Fla. 5th DCA 2018) Court made comments to attorney for husband in a temporary relief hearing suggesting he file certain motions and dissuading him from amending pleadings, creating an appearance of favoring one party and requiring disqualification.

Blackpool Assocs. v. Sm-106, Ltd., 839 So. 2d 837 (Fla. 4th DCA 2003). Court assisted attorney during litigation.

Chastine v. Broome, 629 So. 2d 293 (Fla. 4th DCA 1993). The judge passed along a note during trial to the prosecutor saying "sometimes it is better not to cross-examine witnesses." Though the judge explained he would help the defense with trial tips also, disqualification was necessary because the taint of bias against the defendant existed.

Leigh v. Smith, 503 So. 2d 989 (Fla. 5th DCA 1987). Allegations the judge "signaled" to an attorney (alleged to be a close friend) when to object during a hearing raised sufficient questions of bias necessitating disqualification.

Previous JQC/Bar complaint

The Commentary to Canon 3E(1) states: "If a lawyer or a party has previously filed a complaint against the judge with the Judicial Qualifications Commission, that fact does not automatically require disqualification of the judge. Such disqualification should be on a case-by-case basis."

Levine v. State, 650 So. 2d 666 (Fla. 4th DCA 1995). Order denying motion for disqualification reversed and remanded. The judge offered to forgo a show cause proceeding if the attorney would not bill the county the $1,000 special public defender's fee in another criminal case. The attorney refused and the attorney's firm then filed a JQC complaint. The filing of the JQC complaint together with the court's offer to drop the contempt citation showed a reasonable fear that the attorney could not receive a fair trial on the subsequently adjudicated contempt order.

Holding a defendant in contempt does not require disqualification, unless the judge becomes personally involved in the conflict. *Oates v. State*, 619 So. 2d 23 (Fla. 4th DCA 1993)

A judge's reporting of an attorney's perceived unprofessional conduct to the Florida Bar, in and of itself, is insufficient to support disqualification. *5-H Corp. v. Padovan*o, 708 So. 2d 244 (Fla. 1997). *Birotte v. State*, 795 So. 2d 112 (Fla. 4th DCA 2001).

Mongelli v. Florida Health Sciences Center, Inc., 339 So. 3d 480 (Fla. 2d DCA 2022). A trial court judge may refer a lawyer perceived as discourteous to a local professionalism panel without concern that he or she, by that action alone, will be subject to disqualification.

BUT SEE: *Samra v. Bedoyan*, 299 So. 3rd 1138 (Fla. 3d DCA 2020) Although a judge's adverse rulings or factual findings cannot ordinarily serve as a basis to seek disqualification, under the unique circumstances of the case, the judge's imposition of sanctions for "egregious conduct" by attorneys created well-founded fear that party would not receive a fair trial.

Filing a suit in federal court against a judge is a legally insufficient basis for the judge's disqualification. *May v. South Florida Water Management District*, 866 So. 2d 205 (Fla. 4th DCA 2004).

Defendant had a reasonable fear of personal prejudice by the trial judge. Defendant's attorneys had filed bar complaint against the judge while she was a state prosecutor and attempted to prevent her appointment to the bench, resulting in acrimony between judge and attorneys. The allegations involved matters beyond the mere reporting of unprofessionalism. *Siegel v. State*, 861 So. 2d 90 (Fla. 4th DCA 2003).

Ex parte communications/off the record statements

Albert v. Rogers, 57 So. 3d 233 (Fla. 4th DCA 2011). Trial court's order on contempt reversed and remanded for re-assignment. After a family law contempt hearing, the judge independently contacted the children's school for information. Father claimed he was not the secondary emergency contact at the school. Mother testified he was listed. The school confirmed to the judge the father was not on any contact list. The judge then expressly relied on this information in the ruling finding the mother in contempt. Mother's fundamental due process rights were denied to her because the judge instigated an independent investigation.

Judge's consideration of extra-record information by performing his own research was improper but did not require disqualification where the actions did not indicate bias. *Krawczuk v. State*, 93 So. 3d 195 (Fla. 2012).

City of Hollywood v. Witt et al., 868 So. 2d 1214 (Fla. 4th DCA 2004). Writ of Prohibition granted. Trial court erred in its denial of motion to disqualify. Sworn affidavit of attorney alleged trial judge made comments, after jury verdict, to another attorney in the presence of others that he thought the City's witnesses "lied" and that defenses at trial were not believable.

Isan v. Isan, 209 So. 2d 40 (Fla. 5th DCA 2016). Holding that trial judge who engaged in ex parte communication with respondent on several occasions before entering a final judgment nearly identical to respondent's proposed final judgment including waiving attorney's fees was enough to demonstrate that a reasonably prudent person would be in fear of not receiving a fair and impartial hearing.

Masten v. State, 159 So.3d 996 (Fla. 3d DCA 2015) – recusal was warranted when trial judge sent 21 paragraph email containing various arguments to party, as this was an ex parte communication, judge also erred by filing a response which suggested she held both personal interest in the appeal of the stay.

Menada, Inc. v. Arevalo, 341 So. 3d 1189 (Fla. 3d DCA 2022) (quoting *Rose v. State*, 601 So. 2d 1181, 1183 (Fla. 1992). "The most insidious result of ex parte communications is their effect on the appearance of the impartiality of the tribunal."

Relationship between judge and party/attorney/witness

Wickham v. State, 998 So. 2d 593 (Fla. 2008). Trial court's denial of 3.850 motion (which included a request to disqualify all judges in the Circuit) reversed and remanded for the temporary re-assignment to a judge outside the Circuit to adjudicate the 3.850 motion. A circuit judge had represented defendant during the initial murder trial. He later was appointed to the Court of Appeal in the same jurisdiction. Because defendant alleged in his motion ineffective assistance of counsel (specifically the judge) and because the judge's wife is also a judge in the same jurisdiction, the defendant has a reasonable fear the entire Circuit would be biased against him.

Mines v. Countrywide Home Loan, Inc., 31 So. 3d 820 (Fla. 1st DCA 2010). Petition for Writ of Prohibition granted. The judge received a favorable interest rate in his personal dealings with a close corporate affiliate of Countrywide. This interest rate was not available to the general public.

Stevens v. Americana Healthcare Corp., 919 So. 2d 713 (Fla. 2d DCA 2006). Writ of Prohibition granted. The court voluntarily disclosed a relationship with three witnesses. The disclosure in and of itself did not require recusal/disqualification. The court went further to invite motions for disqualification and discussed with the attorneys what would be contained within the order of recusal. After the party filed the motion for disqualification, the court denied the motion. "[A] judge should not offer to recuse himself or herself based on a voluntary disclosure of information relevant to the question of disqualification unless the judge means it." *Id.* at 716.

W.I. v. State, 696 So. 2d 457 (Fla. 4th DCA 1997). Writ of Prohibition granted. The presiding judge, during her time as a prosecutor, prosecuted the juvenile defendant on unrelated charges. This past relationship supported a reasonable fear of not receiving a fair trial.

Contested truthfulness of allegations/Non-moving party contests facts on court's behalf

Bundy v. Rudd, 366 So. 2d 440 (Fla. 1978). The judge's comments on the veracity of Bundy's motion for disqualification created "'an intolerable adversar[ial] atmosphere' between the trial judge and the litigant." *Id.* at 442 (citations omitted).

D.H. v. Dep't of Children and Families, 12 So. 3d 266 (Fla. 1st DCA 2009). Final judgment of termination of parental rights reversed and remanded for reassignment to another trial judge. The mother of the child was a former foster child well known to the trial court. DCF filed a TPR petition that alleged the mother's mental health prevented reunification. During the pre-trial conference, the trial court stated it was very familiar with the mother's mental health history. Knowledge of facts in and of itself is not a basis for disqualification. However, in the written order, the trial court attempted to refute the allegations contained in the motion.

Hill v. Feder, 564 So. 2d 609 (Fla. 3d DCA 1990). The trial judge commented the allegations were "in fact, totally false".

Kielbania v. Jasberg, 744 So. 2d 1027 (Fla. 4th DCA 1997). Writ of Prohibition granted. During a hearing on the motion for disqualification, the court explained some issues raised in the allegations, entered documents into evidence, and interjected comments.

Martin v. State, 804 So. 2d 360 (Fla. 4th DCA 2001). Petition for Writ of Prohibition granted. Trial court erred in its denial of motion to disqualify and inappropriately commented on the allegations in the motion thereby placing the court in an adversarial role with the defendant. Affidavit by defendant and copy of news article alleged bias because of the court's comments in a newspaper article that anyone sentenced to incarceration should also always be on probation after release. Judge confirmed his nickname "Judge Follow-By" was appropriate. The allegations created a reasonable fear in defendant that he would receive probation no matter the circumstances.

Written order not timely issued

Tableau Fine Art Group, Inc. v. Jacoboni, 853 So. 2d 299 (Fla. 2003). Created bright-line time limit to issue order on motion for disqualification.

Lightsey v. State, 53 So. 3d 1093 (Fla. 1st DCA 2011). Because the judge failed to rule upon on properly served disqualification motion within requisite time, the motion was automatically granted.

Schisler v. State, 958 So. 2d 503, 505 (Fla. 3d DCA 2007). Because the court issued its ruling 32 days after service of the motion, disqualification was required.

> *Johnson v. State*, 968 So. 2d 61 (Fla. 4th DCA 2007). Timeliness rule applies to successor judges as well.
>
> *Santa Catalina Town Homes v. Mirza*, 942 So. 2d 462 (Fla. 4th DCA 2006). Holding that the motion was deemed to have been granted as time to rule had passed.

G.C. v. Dep't of Children and Families, 804 So. 2d 525, 526 (Fla. 5th DCA 2002). Stating that neither sending a gentle reminder to the judge nor applying for a writ of mandamus "is a burden that should be placed on the movant. The rule places the burden on the judge to rule and the litigant should not be required to nudge the judge. Nor is it right to require a party to file a petition for writ of mandamus."

> *Compare Tobkin v. State*, 889 So. 2d 120 (Fla. 4th DCA 2004). Trial court's failure to rule within 30 days after motion was filed did not require automatic removal because: (1) clerk's office did not forward the motion to the judge, (2) movant sent the judge's copy to the wrong address, and (3) judge ruled within six days after being notified of the pending motion, and one day after actual service.

Public statements on issues

Hayes v. State, 686 So. 2d 694 (Fla. 4th DCA 1996). Judge disqualified for publicly announcing how he would sentence similarly-situated defendants regardless of evidence or argument. *See also Martin v. State*, 804 So. 2d 360 (Fla. 4th DCA 2001).

Judge's comments at a council meeting condemning domestic violence was legally insufficient basis for disqualification. *Rodgers v. State*, 948 So. 2d 655 (Fla. 2006).

Acrimony between judge and attorney

Siegel v. State, 861 So. 2d 90 (Fla. 1st DCA 2003). Lengthy, documented history of acrimony and personal attacks between judge and counsel warranted disqualification.

Wicklund v. Schoff, 755 So. 2d 192 (Fla. 1st DCA 2000). The trial court sent a letter to the attorney stating "I have a low regard for your approach to the practice of law." The letter together with the history of acrimony between the parties required disqualification.

Gonzalez v. State, 896 So. 2d 965 (Fla. 4th DCA 2005). Writ of Prohibition granted. Trial court erred in its denial of motion to disqualify. In 2001, the trial counsel, who was at that time an assistant state attorney, witnessed the court telling a defense attorney that it "could not stand the sight of" him and that he "had no integrity." Clients of trial counsel in 2004 could have a reasonable fear of not receiving a fair trial because of the court's statements made three years prior.

City of Lakeland v. Vocelle, 656 So. 2d 612 (Fla. 1st DCA 1995). Writ of Prohibition denied. Grounds of acrimony between trial court and counsel alleged in movant's affidavit were stale and unable to support disqualification.

Hhh'hing v. State, 917 So. 2d 1009 (Fla. 4th DCA 2006). Fact that a defense attorney has gone public with complaints about a judge does not in and of itself warrant disqualification.

Milmir Construction v. Jones, 626 So. 2d 985 (Fla. 1st DCA 1993). Writ of Prohibition denied. Trial counsel previously opposed the court's appointment as a judge of compensation claims and the judge admitted calling trial counsel a "scumball." Just over one year had passed at the time trial counsel filed the motion for disqualification alleging bias based on their history. The appellate court agreed with the court that the grounds were stale and could not support disqualification.

The reason of bad blood between judge and attorney can go stale.

Bert v. Bermudez, 95 So. 3d 274 (Fla. 3d DCA 2012). Writ of Prohibition denied. Lawyers' theatrics during a hearing that resulted in the trial judge repeatedly admonishing the attorneys did not support disqualification. Trial judges have the right and obligation to control the courtroom. "To require disqualification of a judge whenever a [ ] lawyer's behavior invokes an invited response by the judge, would encourage the

behavior exhibited at this hearing as a means of 'judge shopping.'" *Id.* at 280 (citations omitted).

Jarp v. Jarp, 919 So. 2d 614 (Fla. 3d DCA 2006). Writ of Prohibition denied. Movant claimed judge and trial counsel had an acrimonious relationship stemming from trial counsel's vocal public objection to the court's fitness to take the bench and heated exchanges between the court and trial counsel just after election to the bench. These incidents occurred in 1984. From that time up until 1993, the court granted trial counsel's motions to disqualify or sua sponte recused itself from trial counsel's cases citing their relationship as the issue. The court held that since the events occurred 20 years ago and no new allegations of bias arose, the issue was stale. "Tempers do cool and anger does dissipate." *Id.* The court's prior removal, without more, does not create an objective fear of bias. To hold otherwise would allow attorneys to have courts serve at their whim. *See also Edwards-Freeman v. State*, 138 So. 3d 507 (Fla. 4th DCA 2014).

Strasser v. Yalamanchi, 783 So. 2d 1087 (Fla. 4th DCA 2001). Questionable statements by trial court not grounds for disqualification as a personal attack on the attorney because statements were "largely unrelated" to the issue before the court and were given before the court had received evidence.

Previous adverse rulings

Thompson v. State, 759 So. 2d 650 (Fla. 2000). "[T]he fact that a judge has ruled adversely to the party in the past does not constitute a legally sufficient ground for a motion to disqualify."

Santisteban v. State, 72 So. 3d 187 (Fla. 4th DCA 2011). Reversed and remanded for resentencing on other grounds. The defendant's actions spawned simultaneous criminal and civil cases. The civil judge volunteered to assist the criminal judge by hearing the criminal trial. The civil judge had extra time and was familiar with the facts. Previously, the civil judge had ruled that there was sufficient negligence to permit the plaintiffs to plead a claim for punitive damages. The defendant claimed a bias existed because of this adverse ruling. Civil judges are not disqualified from presiding over a criminal trial arising from the same incident. "[T]he trial judge's ruling in the civil case was merely the exercise of a legitimate judicial function." *Id.* at 194.

Letterese v. Brody, 985 So. 2d 597 (Fla. 4th DCA 2008). Writ of Prohibition denied. After hearing lengthy argument, the court's comments of "ad nauseum" and "[a] proctologist couldn't have been more thorough than what we did," while blunt, did not create an objectively reasonable fear of bias against the movant. The movant's complaint stemmed from the judge's ruling.

Subjective fears of movant

May Invs., Inc. v. Lisa, S.A., 814 So. 2d 471 (Fla. 3d DCA 2002). "The subjective fears of a party seeking disqualification of a judge are not reasonably sufficient to justify a well-founded fear of prejudice".

Hendrick v. State, 6 So. 3d 688 (Fla. 4th DCA 2009). The speculative, unreasonable, and unsubstantiated beliefs of the defendant that the trial judge was involved in a conspiracy against him were legally insufficient to support a motion for disqualification.

Nassetta v. Kaplan, 557 So. 2d 919 (Fla. 4th DCA 1990). "A judge's remarks that he is not impressed with a lawyer's or his client's behavior are not, without more, grounds for recusal."

5-H Corp. v. Padovano, 708 So. 2d 244 (Fla. 4th DCA 1998). Fear was too "speculative, attenuated, and too fanciful to warrant relief."

T *Brown v. Pate*, 577 So. 2d 645 (Fla. 1st DCA 1991). Trial court's expression of "grave concern" regarding father's visitation did not serve as a basis for disqualification. A judge may form mental impressions and opinions over the course of a case so long as she does not prejudge the merits.

Facebook "Friends"

Law Offices of Herssein & Herssein P.A.. v. United Services Automobile Association, etc., et al., 271 So. 3d 889 (Fla. 2018). Allegation that trial judge is a Facebook "friend" with and attorney appearing before the judge, standing alone, does not constitute a legally sufficient basis for disqualification.

Social Media, Professionalism, and the Bench

The advent of technology giving rise to our current culture of instantaneous news and communication required the creation of new cyberspace boundaries between the courts and the rest of the world. Deciding what does or does not violate the Canons can be difficult. The Judicial Ethics Advisory Committee has offered some guidance into what does or does not violate the Canons.

What is a friend?

Judicial Ethics Advisory Opinion 2009-20, issued November 17, 2009

In deciding whether the use of a social networking site is prohibited by Canon 2B or 5A, the following is relevant to that analysis: (1) did the judge establish the social networking page him/herself?, (2) does the judge have the right to accept or reject "friends" or contacts on the judge's page?, (3) are the identities of the judge's "friends" readily accessible or identifiable to others? The committee majority concluded that listing lawyers as "friends" on a judge's social networking page conveys the impression these lawyers are in a "special position to influence the judge." The committee did note a distinction between lawyers that may practice in front of that judge (cannot be friends) versus lawyers who do not (can be friends).

Contrast the above from the same opinion with the following: the use of social networking does not violate the Canons if the judge or campaign committee has no control over who lists the site on their own page as a "fan." In other words, anyone wishing to be listed as a "fan" on the campaign site may do so unilaterally. This includes lawyers that may appear before the judge.

A minority of the committee concluded that the term "friend" as used in cyberspace is ubiquitous to the degree that no one could reasonably believe that an "online friend" had any special influence over a judge. Time will tell if future committees adopt this as a majority view.

Judicial Ethics Advisory Opinion 2010-06, issued March 26, 2010

Presently, there is no cure that will simultaneously allow lawyers to appear before the judge and be social networking "friends." Issuing a disclaimer on the social networking page that anyone listed as a friend on the page does not mean there is a special relationship between the judge and that person is not enough to satisfy the Canons. "The committee rejects any contention that a judge can engage in unethical conduct so long as the judge announces at the time that the judge perceives the conduct to be ethical."

A judge may participate on a subject specific social networking if the judge has no control over who may access that site.

It is an issue that will not go away any time soon, as seen in numerous news articles on the subject.

What about my J.A. (other employees)?
Judicial Ethics Advisory Committee Opinion 2010-04, issued March 19, 2010

Judicial assistants may "friend" lawyers that appear before the judge so long as the judicial assistant makes no reference to the judge or judge's office on the social networking site.

Professionalism & Ethics on and off the Bench
A judge is a judge everywhere, whether it is the grocery store, a child's sports event, or a spouse's work party. Additionally, a judge's demeanor when interacting with staff outside of court is subject to the same scrutiny as their treatment of people in the courtroom.

Things to ask yourself before posting or speaking:

- Would I be embarrassed if this comment/photo were published in the newspaper?
- Does it arguably demean my office?
- How would this read in a transcript/look in a headline?
- Is it really necessary or productive to say/do?

Relationships with J.A's, bailiffs, clerks and court administration.

Your J.A. is your face to the outside world. Make sure you draw clear lines from the beginning as to your expectations of how they will interact with the public and lawyers, and what, if anything, they will say about their job on their own social media.

Your bailiff is your ally and protector in court. Make sure you have a conversation with them about how you want your courtroom to be administered. They have your best interests in mind and want to keep you safe. Their judgment on security issues is usually sound; however, they should be instructed about the professional and respectful way you want your courtroom to appear.

Your clerks and court reporters are there to support and assist you. Always be respectful and courteous and remember to give them regular breaks during large dockets or long hearings.

Court administration exists to support the judiciary. They are not, however, your personal employees or minions who merely carry out your directives. An ill-tempered judge will quickly get a reputation in the courthouse that is almost impossible to shake and will result in staff being less responsive to them. As government employees, judges are constrained by budgets and limited resources. Don't make demands for furniture, technology, or other items you were used to having at your disposal in your practice and berate court administration when they cannot comply.

When in doubt, consult the Canons.

A judge's conduct, on and off the bench, is governed by the Canons. In addition to providing guidance on recusal and disqualification issues, they contain standards of behavior that judges must meet.

Canon 2. A Judge Shall Avoid Impropriety and the Appearance of Impropriety in all of the Judge's Activities

A. A judge shall respect and comply with the law and shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary.

B. A judge shall not allow family, social, political or other relationships to influence the judge's judicial conduct or judgment. A judge shall not lend the prestige of judicial office to advance the private interests of the judge or others; nor shall a judge convey or permit others to convey the impression that they are in a special position to influence the judge. A judge shall not testify voluntarily as a character witness.

C. A judge should not hold membership in an organization that practices invidious discrimination on the basis of race, sex, religion, or national origin. Membership in a fraternal, sororal, religious, or ethnic heritage organization shall not be deemed to be a violation of this provision.

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Canon 3. A Judge Shall Perform the Duties of Judicial Office Impartially and Diligently

A. *Judicial Duties in General.* --The judicial duties of a judge take precedence over all the judge's other activities. The judge's judicial duties include all the duties of the judge's office prescribed by law. In the performance of these duties, the specific standards set forth in the following sections apply.

B. *Adjudicative Responsibilities.*

(1) A judge shall hear and decide matters assigned to the judge except those in which disqualification is required.

(2) A judge shall be faithful to the law and maintain professional competence in it. A judge shall not be swayed by partisan interests, public clamor, or fear of criticism.

(3) A judge shall require order and decorum in proceedings before the judge.

(4) A judge shall be patient, dignified, and courteous to litigants, jurors, witnesses, lawyers, and others with whom the judge deals in an official capacity, and shall require similar conduct of lawyers, and of staff, court officials, and others subject to the judge's direction and control.

(5) A judge shall perform judicial duties without bias or prejudice. A judge shall not, in the performance of judicial duties, by words or conduct manifest bias or prejudice, including but not limited to bias or prejudice based upon race, sex, religion, national origin, disability, age, sexual orientation, or socioeconomic status, and shall not permit staff, court officials, and others subject to the judge's direction and control to do so. This section does not preclude the consideration of race, sex, religion, national origin, disability, age, sexual orientation, socioeconomic status, or other similar factors when they are issues in the proceeding.

(6) A judge shall require lawyers in proceedings before the judge to refrain from manifesting, by words, gestures, or other conduct, bias or prejudice based upon race, sex, religion, national origin, disability, age, sexual orientation, or socioeconomic status, against parties, witnesses, counsel, or others. This Section 3B(6) does not preclude legitimate advocacy when race, sex, religion, national origin, disability, age, sexual orientation, socioeconomic status, or other similar factors are issues in the proceeding.

(7) A judge shall accord to every person who has a legal interest in a proceeding, or that person's lawyer, the right to be heard according to law. A judge shall not initiate, permit, or consider ex parte communications, or consider other communications made to the judge outside the presence of the parties concerning a pending or impending proceeding except that:

(a) Where circumstances require, ex parte communications for scheduling, administrative purposes, or emergencies that do not deal with substantive matters or issues on the merits are authorized, provided:

(i) the judge reasonably believes that no party will gain a procedural or tactical advantage as a result of the ex parte communication, and

(ii) the judge makes provision promptly to notify all other parties of the substance of the ex parte communication and allows an opportunity to respond.

(b) A judge may obtain the advice of a disinterested expert on the law applicable to a proceeding before the judge if the judge gives notice to the parties of the person consulted and the substance of the advice and affords the parties reasonable opportunity to respond.

(c) A judge may consult with other judges or with court personnel whose function is to aid the judge in carrying out the judge's adjudicative responsibilities.

(d) A judge may, with the consent of the parties, confer separately with the parties and their lawyers in an effort to mediate or settle matters pending before the judge.

(e) A judge may initiate or consider any ex parte communications when expressly authorized by law to do so.

(8) A judge shall dispose of all judicial matters promptly, efficiently, and fairly.

(9) A judge shall not, while a proceeding is pending or impending in any court, make any public comment that might reasonably be expected to affect its outcome or impair its fairness or make any nonpublic comment that might substantially interfere with a fair trial or hearing. The judge shall require similar abstention on the part of

court personnel subject to the judge's direction and control. This Section does not prohibit judges from making public statements in the course of their official duties or from explaining for public information the procedures of the court. This Section does not apply to proceedings in which the judge is a litigant in a personal capacity.

(10) A judge shall not, with respect to parties or classes of parties, cases, controversies or issues likely to come before the court, make pledges, promises or commitments that are inconsistent with the impartial performance of the adjudicative duties of the office.

(11) A judge shall not commend or criticize jurors for their verdict other than in a court order or opinion in a proceeding, but may express appreciation to jurors for their service to the judicial system and the community.

(12) A judge shall not disclose or use, for any purpose unrelated to judicial duties, nonpublic information acquired in a judicial capacity.

C. *Administrative Responsibilities.*

(1) A judge shall diligently discharge the judge's administrative responsibilities without bias or prejudice and maintain professional competence in judicial administration, and should cooperate with other judges and court officials in the administration of court business.

(2) A judge shall require staff, court officials, and others subject to the judge's direction and control to observe the standards of fidelity and diligence that apply to the judge and to refrain from manifesting bias or prejudice in the performance of their official duties.

(3) A judge with supervisory authority for the judicial performance of other judges shall take reasonable measures to assure the prompt disposition of matters before them and the proper performance of their other judicial responsibilities.

(4) A judge shall not make unnecessary appointments. A judge shall exercise the power of appointment impartially and on the basis of merit. A judge shall avoid nepotism and favoritism. A judge shall not approve compensation of appointees beyond the fair value of services rendered.

D. *Disciplinary Responsibilities.*

(1) A judge who receives information or has actual knowledge that substantial likelihood exists that another judge has committed a violation of this Code shall take appropriate action.

(2) A judge who receives information or has actual knowledge that substantial likelihood exists that a lawyer has committed a violation of the Rules Regulating The Florida Bar shall take appropriate action.

(3) Acts of a judge, in the discharge of disciplinary responsibilities, required or permitted by Sections 3D(1) and 3D(2) are part of a judge's judicial duties and shall be absolutely privileged, and no civil action predicated thereon may be instituted against the judge.

E. *Disqualification.*

(1) A judge shall disqualify himself or herself in a proceeding in which the judge's impartiality might reasonably be questioned, including but not limited to instances where:

(a) the judge has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of disputed evidentiary facts concerning the proceeding;

(b) the judge served as a lawyer or was the lower court judge in the matter in controversy, or a lawyer with whom the judge previously practiced law served during such association as a lawyer concerning the matter, or the judge has been a material witness concerning it;

(c) the judge knows that he or she individually or as a fiduciary, or the judge's spouse, parent, or child wherever residing, or any other member of the judge's family residing in the judge's household has an economic interest in the subject matter in controversy or in a party to the proceeding or has any other more than de minimis interest that could be substantially affected by the proceeding;

(d) the judge or the judge's spouse, or a person within the third degree of relationship to either of them, or the spouse of such a person:

(i) is a party to the proceeding, or an officer, director, or trustee of a party;

(ii) is acting as a lawyer in the proceeding;

(iii) is known by the judge to have a more than de minimis interest that could be substantially affected by the proceeding;

(iv) is to the judge's knowledge likely to be a material witness in the proceeding.

(e) the judge's spouse or a person within the third degree of relationship to the judge participated as a lower court judge in a decision to be reviewed by the judge.

(f) the judge, while a judge or candidate for judicial office, has made a public statement that commits, or appears to commit, the judge with respect to:

(i) parties or classes of parties in the proceeding;

(ii) an issue in the proceeding; or

(iii) the controversy in the proceeding.

(2) A judge should keep informed about the judge's personal and fiduciary economic interests, and make a reasonable effort to keep informed about the economic interests of the judge's spouse and minor children residing in the judge's household.

F. *Remittal of Disqualification.* --A judge disqualified by the terms of Section 3E may disclose on the record the basis of the judge's disqualification and may ask the parties and their lawyers to consider, out of the presence of the judge, whether to waive disqualification. If following disclosure of any basis for disqualification other than personal bias or prejudice concerning a party, the parties and lawyers, without participation by the judge, all agree the judge should not be disqualified, and the judge is then willing to participate, the judge may participate in the proceeding. The agreement shall be incorporated in the record of the proceeding.

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Canon 5. A Judge Shall Regulate Extrajudicial Activities to Minimize the Risk of Conflict With Judicial Duties

A. Extrajudicial Activities in General. A judge shall conduct all of the judge's extra-judicial activities so that they do not:

(1) cast reasonable doubt on the judge's capacity to act impartially as a judge;

(2) undermine the judge's independence, integrity, or impartiality;

(3) demean the judicial office;

(4) interfere with the proper performance of judicial duties;

(5) lead to frequent disqualification of the judge; or

(6) appear to a reasonable person to be coercive.

B. Avocational Activities. A judge is encouraged to speak, write, lecture, teach and participate in other extrajudicial activities concerning non-legal subjects, subject to the requirements of this Code.

C. Governmental, Civic or Charitable Activities.

(1) A judge shall not appear at a public hearing before, or otherwise consult with, an executive or legislative body or official except on matters concerning the law, the legal system or the administration of justice or except when acting pro se in a matter involving the judge or the judge's interests.

(2) A judge shall not accept appointment to a governmental committee or commission or other governmental position that is concerned with issues of fact or policy on matters other than the improvement of the law, the legal system, the judicial branch, or the administration of justice. A judge may, however, represent a country, state or locality on ceremonial occasions or in connection with historical, educational or cultural activities.

(3) A judge may serve as an officer, director, trustee or non-legal advisor of an educational, religious, charitable, fraternal, sororal or civic organization not conducted for profit, subject to the following limitations and the other requirements of this Code.

(a) A judge shall not serve as an officer, director, trustee or non-legal advisor if it is likely that the organization

(i) will be engaged in proceedings that would ordinarily come before the judge, or

(ii) will be engaged frequently in adversary proceedings in the court of which the judge is a member or in any court subject to the appellate jurisdiction of the court of which the judge is a member.

(b) A judge as an officer, director, trustee or non-legal advisor, or as a member or otherwise:

(i) may assist such an organization in planning fund-raising and may participate in the management and investment of the organization's funds, but shall not personally or directly participate in the solicitation of funds, except that a judge may solicit funds from other judges over whom the judge does not exercise supervisory or appellate authority;

(ii) shall not personally or directly participate in membership solicitation if the solicitation might reasonably be perceived as coercive;

(iii) shall not use or permit the use of the prestige of judicial office for fund-raising or membership solicitation.

D. Financial Activities.

(1) A judge shall not engage in financial and business dealings that

(a) may reasonably be perceived to exploit the judge's judicial position, or

(b) involve the judge in frequent transactions or continuing business relationships with those lawyers or other persons likely to come before the court on which the judge serves.

(2) A judge may, subject to the requirements of this Code, hold and manage investments of the judge and members of the judge's family, including real estate, and engage in other remunerative activity.

(3) A judge shall not serve as an officer, director, manager, general partner, advisor or employee of any business entity except that a judge may, subject to the requirements of this Code, manage and participate in:

(a) a business closely held by the judge or members of the judge's family, or

(b) a business entity primarily engaged in investment of the financial resources of the judge or members of the judge's family.

(4) A judge shall manage the judge's investments and other financial interests to minimize the number of cases in which the judge is disqualified. As soon as the judge can do so without serious financial detriment, the judge shall divest himself or herself of investments and other financial interests that might require frequent disqualification.

(5) A judge shall not accept, and shall urge members of the judge's family residing in the judge's household not to accept, a gift, bequest, favor or loan from anyone except for:

(a) a gift incident to a public testimonial, books, tapes and other resource materials supplied by publishers on a complimentary basis for official use, or an invitation to the judge and the judge's spouse or guest to attend a bar-related function or an activity devoted to the improvement of the law, the legal system, or the administration of justice, including attending, without charge, a bar-related lunch, dinner, or social event; and if the value of attending an individual function or event exceeds $100, the judge shall report it under Canon 6B(2);

(b) a gift, award or benefit incident to the business, profession or other separate activity of a spouse or other family member of a judge residing in the judge's household, including gifts, awards and benefits for the use of both the spouse or other family member and the judge (as spouse or family member), provided the gift, award or benefit could not reasonably be perceived as intended to influence the judge in the performance of judicial duties;

(c) ordinary social hospitality;

(d) a gift from a relative or friend, for a special occasion, such as a wedding, anniversary or birthday, if the gift is fairly commensurate with the occasion and the relationship;

(e) a gift, bequest, favor or loan from a relative or close personal friend whose appearance or interest in a case would in any event require disqualification under Canon 3E;

(f) a loan from a lending institution in its regular course of business on the same terms generally available to persons who are not judges;

(g) a scholarship or fellowship awarded on the same terms and based on the same criteria applied to other applicants; or

(h) any other gift, bequest, favor or loan, only if: the donor is not a party or other person who has come or is likely to come or whose interests have come or are likely to come before the judge; and, if its value, or the aggregate value in a calendar year of such gifts, bequests, favors, or loans from a single source, exceeds $100.00, the judge reports it in the same manner as the judge reports gifts under Canon 6B(2).

E. Fiduciary Activities.

(1) A judge shall not serve as executor, administrator or other personal representative, trustee, guardian, attorney in fact or other fiduciary, except for the estate, trust or person of a member of the judge's family, and then only if such service will not interfere with the proper performance of judicial duties.

(2) A judge shall not serve as a fiduciary if it is likely that the judge as a fiduciary will be engaged in proceedings that would ordinarily come before the judge, or if the estate, trust or ward becomes involved in adversary proceedings in the court on which the judge serves or one under its appellate jurisdiction.

(3) The same restrictions on financial activities that apply to a judge personally also apply to the judge while acting in a fiduciary capacity.

F. Service as Arbitrator or Mediator.

(1) A judge shall not act as an arbitrator or mediator or otherwise perform judicial functions in a private capacity unless expressly authorized by law or Court rule. A judge may, however, take the necessary educational and training courses required to be a qualified and certified arbitrator or mediator, and may fulfill the requirements of observing and conducting actual arbitration or mediation proceedings as part of the certification process, provided such program does not, in any way, interfere with the performance of the judge's judicial duties.

(2) A senior judge may serve as a mediator in a case in a circuit in which the senior judge is not presiding as a judge only if the senior judge is certified pursuant to rule 10.100, Florida Rules for Certified and Court-Appointed Mediators. Such senior judge may be associated with entities that are solely engaged in offering mediation or other alternative dispute resolution services but that are not otherwise engaged in the practice of law. However, such senior judge may not advertise, solicit business, associate with a law firm, or participate in any other activity that directly or indirectly promotes his or her mediation, arbitration, or voluntary trial resolution services and shall not permit an entity with which the senior judge associates to do so. A senior judge shall not serve as a mediator, arbitrator, or voluntary trial resolution judge in any case in a circuit in which the

judge is currently presiding as a senior judge. A senior judge who provides mediation, arbitration, or voluntary trial resolution services shall not preside over any case in the circuit where such services are provided; however, a senior judge may preside over cases in circuits in which the judge does not provide such dispute-resolution services. A senior judge shall disclose if the judge is being utilized or has been utilized as a mediator, arbitrator, or voluntary trial resolution judge by any party, attorney, or law firm involved in the case pending before the senior judge. Absent express consent of all parties, a senior judge is prohibited from presiding over any case involving any party, attorney, or law firm that is utilizing or has utilized the judge as a mediator, arbitrator, or voluntary trial resolution judge within the previous three years. A senior judge shall disclose any negotiations or agreements for the provision of services as a mediator, arbitrator, or voluntary trial resolution judge between the senior judge and any parties or counsel to the case.

G. Practice of Law. A judge shall not practice law. Notwithstanding this prohibition, a judge may act pro se and may, without compensation, give legal advice to and draft or review documents for a member of the judge's family.

SELECT COMMENTARY FROM THE CANONS TO CONSIDER

Irresponsible or improper conduct by judges erodes public confidence in the judiciary. A judge must avoid all impropriety and appearance of impropriety. A judge must expect to be the subject of constant public scrutiny. A judge must therefore accept restrictions on the judge's conduct that might be viewed as burdensome by the ordinary citizen and should do so freely and willingly. Examples are the restrictions on judicial speech imposed by Sections 3B(9) and (10) that are indispensable to the maintenance of the integrity, impartiality, and independence of the judiciary.

The test for appearance of impropriety is whether the conduct would create in reasonable minds, with knowledge of all the relevant circumstances that a reasonable inquiry would disclose, a perception that the judge's ability to carry out judicial responsibilities with integrity, impartiality, and competence is impaired.

Judges should distinguish between proper and improper use of the prestige of office in all of their activities. For example, it would be improper for a judge to allude to his or her judgeship to gain a personal advantage such as deferential treatment when stopped by a police officer for a traffic offense. Similarly, judicial letterhead must not be used for conducting a judge's personal business, although a judge may use judicial letterhead to write character reference letters when such letters are otherwise permitted under this Code.

A judge must avoid lending the prestige of judicial office for the advancement of the private interests of others. For example, a judge must not use the judge's judicial position to gain advantage in a civil suit involving a member of the judge's family. In contracts for publication of a judge's writings, a judge should retain control over the advertising to avoid exploitation of the judge's office.

Membership of a judge in an organization that practices invidious discrimination gives rise to perceptions that the judge’s impartiality is impaired. Whether an organization practices invidious discrimination is often a complex question to which judges should be sensitive. The answer cannot be determined from a mere examination of an organization's current membership rolls but rather depends on the history of the organization's selection of members and other relevant factors, such as that the organization is dedicated to the preservation of religious, ethnic, or cultural values of legitimate common interest to its members, or that it is in fact and effect an intimate, purely private organization whose membership limitations could not be constitutionally prohibited.

This Canon is not intended to prohibit membership in religious and ethnic clubs, such as Knights of Columbus, Masons, B'nai B'rith, and Sons of Italy; civic organizations, such as Rotary, Kiwanis, and The Junior League; young people's organizations, such as Boy Scouts, Girl Scouts, Boy's Clubs, and Girl's Clubs; and charitable organizations, such as United Way and Red Cross.

Complete separation of a judge from extra-judicial activities is neither possible nor wise; a judge should not become isolated from the community in which the judge lives. For that reason, judges are encouraged to participate in extrajudicial community activities.

Expressions of bias or prejudice by a judge, even outside the judge's judicial activities, may cast reasonable doubt on the judge's capacity to act impartially as a judge, and may undermine the independence and integrity of the judiciary. Expressions which may do so include jokes or other remarks demeaning individuals on the basis of their race, sex, religion, national origin, disability, age, sexual orientation or socioeconomic status.

Mere attendance at an event, whether or not the event serves a fund-raising purpose, does not constitute a violation of **Canon** 5C(3)(b). It is also generally permissible for a judge to pass a collection plate at a place of worship or for a judge to serve as an usher or food server or preparer, or to perform similar subsidiary and unadvertised functions at fund-raising events sponsored by educational, religious, charitable, fraternal, or civic organizations, so long as they do not entail direct or personal solicitation. However, a judge may not be a speaker, guest of honor, or otherwise be featured at an organization's fund-raising event, unless the event concerns the law, the legal system, or the administration of justice

Because a gift, bequest, favor or loan to a member of the judge's family residing in the judge's household might be viewed as intended to influence the judge, a judge must inform those family members of the relevant ethical constraints upon the judge in this regard and discourage those family members from violating them. A judge cannot, however, reasonably be expected to know or control all of the financial or business activities of all family members residing in the judge's household.

JUDICIAL ETHICS ADVISORY OPINIONS

Although there are few clear cut answers to "Should I recuse myself?" the Judicial Ethics Advisory Committee provides opinions to judges seeking guidance and should be contacted if you are unsure what course of action to take. All JEAC opinions are archived on the 6th Circuit web site: jud6.org.

IMPROPER USE OF JUDICIAL OFFICE

2021-03: Although a judge may write an advocacy letter on behalf of legislation pertaining to autistic children, they may not identify themselves as a judge.

2020-26: A judge's post-judicial employer may not advertise the judge's prospective employment while still a sitting judge. 2A; 2B; 5A.

WORK HABITS

2020-05: The Canons of Ethics do not prohibit a judge from meeting with an attorney to discuss administrative or procedural matters including docket management, scheduling issues and expectations for motion practice, as long as the judge does not discuss any pending or impending cases, engage in ex parte communication and does not create any doubt as to the judge's impartiality. 3B(7)(8)&(9), 4 and 5A(1-6).

2013-13: Judge may not use the judge's former law office, located in the building where the judge's family's law firm continues to practice law, during non-business hours to perform personal and court-related work. This would give the impression that the law firm has close ties with the judge, which could help a client who uses that firm and would also raise confidentiality issues.

JUDICIAL ASSISTANTS

2006-32: Although judicial assistants are not bound by the Code of Judicial Conduct, judge has obligation to direct his or her judicial assistant not to accept employment cleaning the offices of attorneys likely to appear before the judge. Since the judge could not accept such employment because of the appearance of impropriety, it follows that the judge should not allow someone under his or her direction or control to accept such employment.

2010-04: Judge's judicial assistant may add lawyers who may appear before the judge as "friends" on a social networking site, as long as the activity is wholly independent of the judge and does not reference the judge or the judge's office. 2B and 3C(2).

MEMBERSHIPS AND ACTIVITIES

2021-01: A judge may not maintain membership in a voluntary bar that endorses a candidate for public office, regardless of whether it is an appointed or elected position.

2021-02: A judge may serve on the board of an organization where another board member is a partner in a law firm that appears regularly in front of the judge.

2019-26: A judge may not appear in a video to promote the circuit's jail diversion program where the program is facilitated by a private organization that solicits fees and membership. 2B, 5C(3)(b)(iii).

2019-23: Judges may contact State Attorney, Public Defender, or designated supervisory attorneys to discuss concerns regarding lawyers' conduct, but must avoid ex parte communication about pending matters and comments must be delivered in professional, civil manner. 2A; 3B(3), (4), (6), (7); 3D(2); 4A(1-6); 5A(1-6).

2017-08: A judge may serve as a "judge" for preliminary Miss America pageant competitions. The Canons do not prohibit participation at a pageant competition by showcasing a talent, such as singing, subject to Code's requirement that the judge act "at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary." 2, 2A, 2B, 5A, 5B, 5C(3), Commentary to Canon 2A, Commentary to Canon 5A.

2016-21: A judge may attend the 2017 Presidential Inauguration and may attend the Florida Inaugural Ball being hosted by the Florida State Society.

2017-10: Judge may attend a diversity and racial equality seminar presented by a private organization. Judge shall remain faithful to the law and shall perform judicial duties without bias or prejudice. 3B(2), (5).

2013-03: Judge may not participate in a county elections task force to address issues encountered in the judge's county and throughout the state during a general election. To do so would involve the judge in the political process of the other branches of government. 5C(2), Commentary to 5C(2).

2009-06: Judge may not serve on a local county ethics commission for the purpose of establishing a code of ethics for the county commission because such activity does not involve improving the law, the legal system, or the administration of justice. 4D; 5C(1); and 5C(2) and Commentary to 5.

2008-01: Judge may serve as member of mortgage fraud task force because task force is devoted to improvement of the law, the legal system and the administration of justice; and it would involve no fundraising or promotion of private interests. 4D; 5C(2).

2005-09: Judge may serve as member of the board of a local community children's alliance, on a committee concerning family violence and its reduction, and on committees or organizations chaired by elected officials, even possibly in their election year, as long as these groups are not advocacy groups. 2C, 5A, and 5C(3).

2016-11: An inquiring judge may not serve on a School Advisory Committee for a public elementary school because the committee is a committee concerned with issues of fact or policy unrelated to the law, the legal system, or the judiciary. An inquiring judge may however serve as a board member of a non-partisan political and public affairs organization that functions to inform and educate the community's business, political, and social interests and to promote more active participation of all citizens in the democratic process because a judge may become a member of and attend nonpartisan public awareness organizations.

2013-07: Judge may serve as a college football referee, as long as it does not conflict with judicial duties.

2012-34: Judge may accept an invitation from a university editorial board member to critique a book written by the lead defense attorney of a well-publicized criminal case in which the defendant remains a party in pending proceedings. However, given the restrictions of the Code of Judicial Conduct and the possibility that the publisher or defense attorney would use the critique to advance their private interests, the judge should decline.

2009-04: Judge may serve as an officer of the alumni association of a public university in Florida as long as the office does not involve conduct that violates Canon 5.

2023-1: Civil judge who presides over insurance-related cases and who filed an insurance claim following Hurricane Michael should 1) disclose to all insurance-related litigants in their division of the judge's filing of a hurricane-related insurance claim; and 2) recuse themselves from any cases involving the same insurance company with whom the judge's claim is pending. If the judge's claim settles, there should be disclosure of the existence of the insurance claim and its settlement for a reasonable period of time after its occurrence due to the direct dealings between the judge and the insurance company. If the judge is represented by an attorney, and that attorney comes before the judge on either a contested or uncontested matter, the judge must automatically recuse himself or herself for a reasonable period of time after the representation ends.

GIFTS

2019-19: A judge may accept the gift of a free stay in a hotel suite if the gift is made by a party whose interests have not appeared and are not likely to appear before the judge, if proper disclosure is made.

2017-06: Permissible for the copiers to be donated by a professional association to the court system for the exclusive use and benefit of attorneys in the courtroom. The facts of this inquiry do not involve a gift to any judge or court employee.

2017-04: A judge may allow law-related organizations and a private law firm to jointly host a free post-seminar reception at the judges' courthouse and may accept food/drink provided by the organizations/law firm at the event.

2014-01: It is not acceptance of a "gift" for a judge to permit the use of chambers for the display of art acquired by the local government for display in an art-in-public-places program.

2013-12: General magistrate may accept and use a government rate discount applicable to all attorneys employed by the government for tickets to the local legal aid organization's annual gala, if the general magistrate's conduct does not appear to a reasonable person to cast reasonable doubt on the capacity to act impartially as a general magistrate.

2013-05: Judge assigned to a dependency division may accept donations of items for children to play with while the children are in court, as long as neither the judge nor the judge's court personnel solicits the donations.

PRIOR DEALINGS/RELATIONSHIPS WITH ATTORNEYS

2020-08: A disqualification is required when the judge's brother-in-law is a partner in a large firm whose members may appear before the judge. 3E(1)(a) and (d), 3F.

2019-24: A judge need not disqualify himself or herself from cases involving an insurance company with whom the judge amicably settled a claim, but should disclose that fact to the parties in all cases involving the same insurance company for a reasonable period of time. 3E(1)

2019-07: Disqualification is not required where judge's only business relationship with law firm and attorney who will appear before the judge involved referral of cases to the lawyer and law firm several years ago when the judge was still practicing law. 2, 3, 3E(1), 3E(1)(b), 3E(1)(d)(ii), 5D(1)(b).

2019-17: A judge need not recuse when law partner of judge's spouse assigns the preparation of amicus brief to members of Florida Bar committee. Disclosure is also not required unless the judge's impartiality might be reasonably questioned. 3E(1).

2019-08: A judge need not recuse when law partner of judge's spouse assigns the preparation of amicus brief to members of Florida Bar committee. Disclosure is also not required unless the judge's impartiality might be reasonably questioned. 3E(1).

2019-06: A judge is not automatically disqualified in all cases involving a law firm that employs the judge's child in a part-time, temporary position. Disclosure is also not required unless the judge's impartiality might be reasonably questioned. 3E, 3E(1).

2018-26: A judge is not required to disqualify himself or herself from all criminal cases solely because the judge's child is an attorney employed by the Public Defender, so long as the as the child has no involvement in the cases heard by the judge. The judge is not required to routinely disclose the fact that the child is employed by the Public Defender where the child is assigned to a different division of the court.

2018-22: A judge is not required to automatically disqualify himself/herself from all cases involving a law firm solely because the judge's close relative and that relative's company hire the law firm to represent the company on matters unrelated to any case pending before the judge or lawyer appearing before the court.

2018-13: A judge married to a public defender may preside over the criminal mental health, drug, and veteran diversion courts where the judge's spouse is responsible for the supervision of the public defender's assigned to represent defendants in the respective diversion courts, but should not preside over cases where the judge's spouse is the attorney of record, or cases which the spouse supervises.

2017-21: General magistrate need not recuse himself/herself from presiding over Marchman Act proceedings when a party is represented by an attorney who previously represented the magistrate's brother-in-law in a Marchman Act case before another general magistrate presiding in the same circuit, unless the general magistrate determines that he/she has a personal bias or prejudice. General magistrate is required to disclose the lawyer's representation of the general magistrate's brother-in-law until no reasonable person would consider the information relevant to a determination of the magistrate's impartiality. General magistrate may order a respondent to attend treatment at a particular facility where the magistrate's brother-in-law is a current or former patient. 2 and 3E(1).

2017-20: A judge shall be disqualified if an attorney from a law firm in which the judge's brother-in-law is a partner appears as counsel in a case before the judge, subject to remittitur. A judge may enter an agreed-upon order submitted by the parties appointing the judge's cousin as a mediator, so long as selection of the cousin as a mediator is initiated by the parties. A judge shall not be disqualified if the wife or daughter of the judge's cousin appears before the judge, unless there is a close familial relationship between the judge and the wife or daughter of the judge's cousin such that the judge's impartiality may reasonably be questioned. However, the judge must disclose the relationship when the wife or daughter of the judge's cousin, or a member of their respective law firms, appears before the judge. 3C(4), 3E(1)(d)(i-iv), 3F.

2017-03: Judge must disclose that a lawyer appearing before the judge has referred case to the judge's spouse and that the lawyer may receive a referral fee from judge's spouse. However, the judge is not automatically required to recuse after disclosure. 3E(1), 3E(2).

2016-02: A judge must adamantly and genuinely encourage a law firm not to promote or market the Judge's parent-child relationship with an attorney in the law firm. 2B.

2015-09: Judge may not retain judicial assistant after the judge's child marries the judicial assistant. 2A, 3C(2), 3C(4), 3E(1)(d), Definitions, and Commentary to 3C(4).

2020-23: A judge is not disqualified from involvement in proceedings in which one of the attorneys is a former client of the judge or is a member of a law firm formerly represented by the judge. A judge must disclose for a reasonable time period that an attorney for one of the parties was previously represented by the judge. Canon. 3E.

2017-17: Judge who has recently assumed the bench is not required to self-recuse from presiding over cases involving a party who was until recently a client of the judge unless the judge's impartiality might reasonably be questioned. 2 and 3E(1).

2007-16: A judge is not automatically disqualified in all cases involving a law firm that employs the judge's son-in-law as a part-time law clerk because the son-in-law has no more than a de minimus interest in most proceedings and the judge's impartiality is unlikely to be reasonably questioned. However, disclosure is required, and disqualification might be required if the son-in-law was working on the case in question. The JEAC endorsed a case-by-case analysis .

2005-06: Judge must disclose spouse's business relationship with attorney in matters involving that attorney's firm if, after considering several factors, the judge thinks it possible that a party might reasonably express concern over the judge's ability to remain impartial. However, recusal would not be required unless the judge knows spouse would have more than a de minimis interest in the outcome of the proceeding.

2005-05: Even after four years had passed since judge represented medical center in medical malpractice claims, judge was still required to disclose former attorney-client relationship.

JUDGE AS MANDATORY REPORTER

2019-13: Judges must comply with section 39.201, Florida Statutes (2019) by reporting information regarding child abuse, neglect, etc. Filing such a report does not constitute a prohibited ex parte communication, but no independent investigation is authorized. Judges are not required to use DCF's form when reporting. Recusal may be appropriate in certain circumstances.

PRIOR OR POTENTIAL POLITICAL OPPONENTS/SUPPORTERS

2019-12: Automatic recusal is not required in cases in which the judge's former opponent in a recent, contested election appears as an attorney before the judge, when no recusal request has been made and there is no suggestion of bias, animosity, or other reasons for recusal. A judge's discretion rather than a specified time period governs whether to self-recuse in these circumstances. Any possible future motions to disqualify submitted by a recent former campaign opponent should be given serious consideration.

2018-03: Judge need not recuse based on information that an attorney who regularly appears before the judge is "thinking" of running against the judge. Judge should not inquire of the attorney about plans to challenge the judge during upcoming election.

SOCIAL RELATIONSHIPS

2019-16: A judge need not automatically recuse, but must disclose a romantic relationship with an attorney in cases where one side is represented by the firm that has a limited professional, but not profit-sharing, relationship with that attorney, even though that attorney is not involved in the case.

2012-37: Judge must disclose relationship in all cases involving a bank whose loan collection official is the judge's close personal friend, but must recuse only from cases in which the friend appears as a party, witness, or representative of the bank, or when the judge's impartiality might reasonably be questioned.

2010-37: Judge may not allow juveniles to perform court-ordered community service by participating in a jogging program with the judge because such participation could undermine the impartiality of the judge and judicial office.

2010-08: Judge may not serve as chief judge of a circuit while in a committed relationship with one of the general magistrates in that circuit, even if the judge serving as the chief judge did not have a role in hiring the magistrate. This impropriety or appearance of impropriety will continue to exist even if the judge's first act upon becoming chief judge of the circuit is to execute an administrative order formally transitioning all supervisory authority over all general magistrates to another circuit court judge.

2010-06: Judge who is a member of a voluntary bar association is not required to "de-friend" lawyers who are also members on that organization's Facebook page and who use Facebook to communicate among themselves about that organization and other non-legal matters. However, a judge may not allow an attorney access to the judge's personal social networking page as a "friend," even if the judge sends a communication to all attorney "friends" or posts a permanent, prominent disclaimer on the judge's Facebook profile page that the term "friend" should be interpreted to simply mean that the person is an acquaintance of the judge and not a "friend" in the traditional sense. This prohibition of judges "friending" attorneys who may appear before the judge remains true if the judge accepts as "friends" all attorneys who request to be included or all persons whose names the judge recognizes, and others whose names the judge does not recognize but who share a number of common friends. 2A; 2B; 3E; Commentary to 2A; and Commentary to Canon 3E(1).

2010-02: Pursuant to the Florida Code of Judicial Conduct, when a judge is a partner in a building partnership with the County Attorney, the judge must disqualify himself or herself from all cases in which the county is involved. Such disqualification is required except in cases in which the county is represented by outside counsel which is independent of the County Attorney's supervision

2010-01: Judge may not rent a room in the judge's home to a non-related person who is on community control because the judge could bear witness to the person's conduct and thus, potentially become a witness in court.

Tab K - Sworn Declaration of John W. Liccione: Affidavit confirming fraudulent “N/N” VBM entries and concealment

SWORN AFFIDAVIT OF JOHN WILLIAM LICCIONE

STATE OF FLORIDA
COUNTY OF PINELLAS

I, **John William Liccione**, being of sound mind and 65 years of age, residing in Pinellas County, Florida, do hereby solemnly swear and affirm under penalty of perjury that the following statements are true and correct to the best of my knowledge and belief. I was a Democratic candidate for United States Congress in Florida's 13th Congressional District in the 2024 primary election and a candidate for Mayor of Gulfport, Florida, in the 2025 municipal election. I make this Sworn Declaration based on my direct personal knowledge of the events described herein, and I am competent to testify to these matters in a court of law.

1. On February 25, 2025, I filed a sworn criminal complaint (Case No. GP25-3378) alleging election fraud with the Gulfport Police Department in Gulfport, Florida. In that complaint, I included as an exhibit a spreadsheet derived from vote-by-mail (VBM) reports, listing all Gulfport voters who had supposedly requested VBM ballots in the March 11, 2025, municipal election. These VBM report records showed "N" and "N" in the ID submission flag fields (indicating no Social Security Number last four digits or Florida Driver's License number provided) and a ballot request date of January 11, 2025, for over 410 Gulfport voters.

2. A week before the March 11, 2025 mayoral election, on March 4, 2025, I hand delivered under cover letter to State Attorney Bruce Bartlett of the Sixth Judicial Circuit of Florida, the aforementioned Gulfport Police Department criminal complaint, along with the same evidence (including my own falsified VBM record, a VR Systems ballot request confirmation email proving I had requested my VBM ballon on January 8, 2025, the spreadsheet listing approximately 410 affected Gulfport voters with the January 11, 2025, fake request dates and the "N/N" ID submission flag issue, and the police report). This cover letter (see Exhibit A), demanded a grand jury investigation into the alleged election fraud. I would receive no response from the State Attorney's Office before the March 11 election, nor would I for over a month.

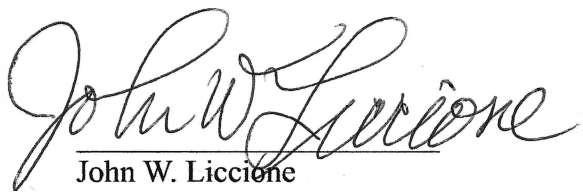
3. On April 7, 2025, at 1:28 PM, I received a phone call from Investigator Gordon Byrd of the Sixth Judicial Circuit State Attorney's Office. Investigator Byrd informed me that a determination had been made by the State Attorney that no election crimes had been committed in connection with the matters I had reported. He further stated, in substance and effect, that he was *prohibited* from disclosing the root cause of what I had called the "No-No Ballot request" phenomenon (referring to the false "N/N" ID submission flags and related request date anomalies in Pinellas County Supervisor of Elections VBM reports) beyond characterizing it as a "*process issue*." Investigator Byrd explicitly

attributed these orders prohibiting disclosure to me to State Attorney Bruce Bartlett himself, and to his direct supervisor, Chief Investigator David Wawrzynski, who is the head of the State Attorney's Investigations Unit. Investigator Byrd repeated the phrase "it's a process issue" several times during the conversation, as if it were a scripted or prepared talking point.

4. On April 18, 2025, I filed a public records request with the Sixth Judicial Circuit State Attorney's Office requesting all records regarding the investigation into the election fraud alleged in my request for a grand jury investigation. (See Exhibit B)

5. As of August 20, 2025, I have not received any responsive records from the Sixth Judicial Circuit State Attorney's Office.

I declare under penalty of perjury under the laws of the United States of America and the State of Florida that the foregoing is true and correct. Executed on this 20th day of August, 2025, in Pinellas County, Florida.



John W. Liccione

Attached:

Exhibit A: John Liccione's cover letter to Bruce Bartlett.
Exhibit B: John Liccione's Public Records Request Emails

ACKNOWLEDGEMENT

STATE OF FLORIDA }
COUNTY OF PINELLAS }

The foregoing instrument was acknowledged before me by means of

✓ physical presence or
____ online notarization

by JOHN W. LICCIONE, as NA for NA on AUGUST 20, 2025.

Notary Public
My commission expires on:

Personally Known _____

OR

Produced Identification ✓

Type of Identification Produced: FLDL

CHRIS N. DOURIDAS
Notary Public, State of Florida
Commission# HH 480720
My comm. expires Jan. 20, 2028

EXHIBIT A

March 2, 2025

John W Liccione
907 Hull St
Gulfport, FL 33707
(443) 698-8156
jliccione@gmail.com

State Attorney Bruce Bartlett
Office of the State Attorney
Sixth Judicial Circuit of Florida
14250 49th Street North
Clearwater, FL 33762

Subject: Urgent Request to Convene a Grand Jury Investigation into Election Fraud, Identify Theft, Wire Fraud, Mail Fraud, Computer Hacking and a Criminal RICO conspiracy

Dear State Attorney Bartlett:

I, John W. Liccione, a registered voter in Gulfport, Florida, and a candidate in the upcoming March 11, 2025 mayoral election, formally request that your office convene a grand jury investigation pursuant to Florida Statute 104.43. The evidence I have gathered demonstrates that widespread election fraud is being committed, affecting hundreds of voters in Gulfport, including myself, and thousands across Pinellas County.

Pursuant to Florida Statute 104.43, I, as both a candidate and a qualified voter, have standing to request a special grand jury investigation to uncover the full extent of these violations and prevent further corruption of the electoral process. I am also requesting that Pinellas County Supervisor of Elections Julie Marcus and her subordinates, and other relevant witnesses such as Chief of Election Crimes and Security, Andrew Darlington, be subpoenaed to testify before the grand jury.

As outlined in my Sworn Criminal Complaint filed with the Gulfport Police Department on February 25, 2025, the fraudulent activities include unauthorized modifications to vote-by-mail (VBM) ballot request records, unauthorized use of voter identification data, fraudulent ordering of VBM ballots, and potential violations of both state and federal election integrity laws

including interstate wire fraud, computer hacking, and mail fraud. Specifically, my investigation and supporting documentation reveal that:

1. The record of my original VBM ballot request, submitted on January 8, 2025, was fraudulently altered three days later, and a second unauthorized VBM ballot request was submitted in my name on January 11, 2025. It was then altered again on January 27, 2025.
2. There are 410 other Gulfport voters who were affected in exactly the same way on January 11. 2025ly affected by the fraudulent ballot request and modification scheme, jeopardizing their ability to vote. Two of those are running for Gulfport City Council.
3. The data manipulation and VBM ballot requests and ballot harvesting targeted the Pinellas County Supervisor of Elections' voter database, involving a cybersecurity breach of the VR Systems election management software, which is hosted in an Amazon data center in northern Virginia.
4. These actions constitute serious violations of Florida election laws, including but not limited to Florida Statutes § 101.62(1)(a) and (b), § 104.041, § 104.051(2), § 104.31, § 815.06, and § 817.568.

Additionally, this matter implicates federal crimes, including violations of **18 U.S.C. § 1343 (Wire Fraud) and 18 U.S.C. § 1030 (Computer Fraud and Abuse Act)**. Given the scope and gravity of these allegations, I am requesting that your office convene a **grand jury hearing** immediately to investigate these matters and return indictments where warranted.

Enclosed with this letter, I have provided:

- Sworn Criminal Complaint**,** including supporting exhibits and evidence.
- Gulfport Police Report (GP25-3378), detailing the initial law enforcement response and initial finding of there being probable cause to refer it to the Florida Division of Elections.
- Digital and documentary evidence**,** including VBM data reports and IT forensic analysis.

I am fully prepared to testify and present my findings before the grand jury and assist your office in the investigation and prosecution of any individual found to be responsible for this fraud. Given the urgency of the upcoming election, I request an expedited review and immediate action to protect the integrity of our voting system in these last few days before the 3/11/25 election.

Please confirm receipt of this letter and provide me with a timeline for action. If I do not receive a prompt response, I will escalate this matter to the U.S. Department of Justice and seek emergency injunctive relief in the US District Court of the Middle District of Florida, Tampa Division, where I currently have an active election fraud case pending against Governor Ron DeSantis, Chief of Election Crimes and Security Andrew Darlington, Secretary of State Cord Byrd, VR Systems CEO Mindy Perkins, and Pinellas County Supervisor of Elections Julie Marcus and their general counsel Matt Smith. I've also enclosed a copy of that lawsuit here.

Thank you for your immediate attention to this critical matter. I look forward to your response.

Sincerely,

John W. Liccione
Candidate for Mayor, Gulfport, FL
Former Candidate for Congress, FL CD-13
Registered Voter, Pinellas County

Enclosures:

1. Gulfport Police Report (GP25-3378)
2. Liccione Sworn Criminal Complaint Filed on 1/25/25
3. Exhibit A: Liccione's Wireshark Packet Capture File Screenshot
4. Exhibit B: Screen Shot of Liccione Logged into PSOE Mail Ballot Data Portal on 2/23/25
5. Exhibit C: Screenshot of Liccione's Downloaded 2/21/25 Mail Ballot Data File
6. Exhibit D: 411 Gulfport NO-NO Ballot Requests Recorded by PSOE on 1/11/25
7. Exhibit E: Pages 965-967 extract of full 1833-page Gulfport NO-NO Ballot Request on 1/11/25 showing Liccione's Full VBM Request Record per the PSOE
8. Exhibit F: The Crabber Illustration Showing Evidence Proving Liccione Ordered his VBM Ballot on 1/8/25 and That Someone Submitted a NO-NO Ballot in His Name on 1/11/2025
9. Exhibit G: Liccione vs DeSantis, et al Federal election fraud 1st Amended Complaint.

EXHIBIT B

John Liccione <john@thecrabber.com>

Re: Formal Public Records Request: March 2025 Election Fraud Complaint and SAO Decision to Decline Prosecution

1 message

John Liccione <john@thecrabber.com> Fri, Jul 11, 2025 at 3:13 PM
To: "SA6, PublicRecordsRequests" <PublicRecordsRequests@flsa6.gov>
Bcc: Christopher Gleason <GleasonForPinellas@gmail.com>, johnsiamas@johnsiamas.com

Subj: PUBLIC RECORD REQUEST PRR25-00371, LICCIONE, JOHN - INVESTIGATION.

Ms. Macks,

It has been over two months since I received your April 28th letter confirming receipt of my PRRR25-0037. I have not heard anything back yet.

Please set my expectations as to when my request will be fulfilled, or, at least, when you can or will provide a cost estimate for fulfillment, if any payment is required.

Regards,

John Liccione
443-698-8156
john@thecrabber.com

On Mon, Apr 28, 2025 at 10:32 AM SA6, PublicRecordsRequests <PublicRecordsRequests@flsa6.gov> wrote:

Please see attached letter.

Thank you,

Public Records

State Attorney's Office 6th Circuit

Please be advised that Florida has a broad public records law, and all correspondence via email may be subject to disclosure. Under Florida Law, email address are public record.

From: John Liccione <john@thecrabber.com>
Sent: Friday, April 18, 2025 3:32 PM
To: SA6, PublicRecordsRequests <PublicRecordsRequests@flsa6.gov>
Subject: Formal Public Records Request: March 2025 Election Fraud Complaint and SAO Decision to Decline Prosecution

To: Donna Macks

Public Records Custodian
Office of the State Attorney
Sixth Judicial Circuit

Dear Ms. Macks,

My name is John Liccione. I am the founder and CEO of *The Crabber News*, an investigative journalism media outlet. I was a Democratic candidate for U.S. Congress in Florida's 13th District in 2024 and a candidate for Mayor of Gulfport, Florida in the March 11, 2025 municipal election. As a candidate, i am also a victim of election fraud

On **March 4, 2025**, I hand-delivered to your Clearwater office a formal written criminal complaint and grand jury referral addressed to State Attorney Bruce Bartlett, along with documentary evidence alleging systemic election fraud in the Gulfport mayoral election, including:

A spreadsheet identifying **411 Gulfport voter records** falsified by the "No-No Ballot Bug" in the Voter Focus election system,
My own falsified Vote-by-Mail record (showing a fake request date and missing ID flags),
A confirmation email from VR Systems proving the accurate ballot request date, and
A Gulfport Police Department report recommending referral to the Florida Division of Elections.

On April 7, 2025, I was contacted by an investigator from your office. He informed me that an investigation had been conducted and a determination was made that no crime had been committed. When I asked why, he stated that he was not allowed to disclose the explanation given to him by his boss and Bruce Bartlett, specifically regarding the "No-No Ballot" information in the official VBM reports published to candidates. The nature of the conversation made it clear that he had been instructed not to disclose the reasoning behind your office's decision to decline prosecution, despite my status as the complainant and alleged victim.

Pursuant to Article I, Section 24 of the Florida Constitution and Chapter 119, Florida Statutes, I hereby submit a formal public records request for the following:

Records Requested:

1. All investigator notes, memoranda, and reports generated in connection with your office's investigation into my March 4, 2025 criminal complaint.
2. Any interview recordings, transcripts, summaries, or written accounts of meetings or calls with any witnesses, complainants, or third parties connected to the investigation.
3. The list of all persons interviewed or consulted during your review.
4. All internal communications (emails, memos, meeting notes, chat logs) among members of the SAO6 team regarding this matter.
5. All communications between your office and any third parties, including but not limited to:

   Pinellas County Supervisor of Elections and staff
   the Florida Division of Elections
   VR Systems, Inc.
   Andrew Darlington
   Cord Byrd
   Governor Ron DeSantis
   Maria Matthews
   Julie Marcus
   Matt Smith
   Benjamin Gibson
   William Stafford
   Florida Supervisors of Elections, Inc.

This investigation is now closed. I have been explicitly informed of the decision to decline prosecution, and no exemption under § 119.071(2)(c), Fla. Stat. remains applicable. If your office claims any exemptions, please:

1. Cite each exemption with specificity,
2. Redact only the exempt portion, and
3. Produce the remainder of the record as required by Florida law.

Please provide the records in electronic format where possible. If any fees apply, please notify me in advance. I request acknowledgment of this request within 48 hours and a good faith estimate of the time needed to fulfill it.

Should your office improperly deny this request or fail to timely comply, I reserve the right to pursue immediate legal enforcement under Fla. Stat. § 119.12, including recovery of attorney's fees.

--

John Liccione

Crabber in Chief

The Crabber News: "*Exposing the Secrets of the Enemies of Democracy*"

john@thecrabber.com

443-698-8156 (Signal/Ph)

www.thecrabber.com

John Liccione <john@thecrabber.com>

Public Records Request: 2024-392 from John Liccione

5 messages

publicrecordsrequest <publicrecordsrequest@votepinellas.gov> Fri, Aug 30, 2024 at 7:33 PM
Reply-To: "McKnight-Taylor, Ashley" <ataylor@votepinellas.gov>
To: "john@thecrabber.com" <john@thecrabber.com>

Dear John Liccione,

This will acknowledge receipt of your public records request. We are reviewing our records to determine if there are any records responsive to your request. Once this has been determined, we will provide either the records, or for more extensive requests, an estimate of the cost to provide these records.

You requested the following records:
"A .csv file or excel spreadsheet report showing the source IP address of each and every individual who submitted an absentee ballot request to the Pinellas Supervisor of Elections over the Internet on June 23, 2024. The report need not provide any personally identifiable information, just the following 2 columns: (1) Date/Time of submission; (2) Source IP Address of submitter. It is noted that this type of metadata is typically available as a cybersecurity standard practice in web server logs, firewall logs, cloud service provider (e.g., Cloudflare) reports, and other off-the-shelf IT logging and reporting systems. It would typically take an IT person with proper access credentials less than 30 minutes to generate it and export it to a csv or Excel file."

To inquire about the status of your public records request, please call 727-464-8683.

Thank you,

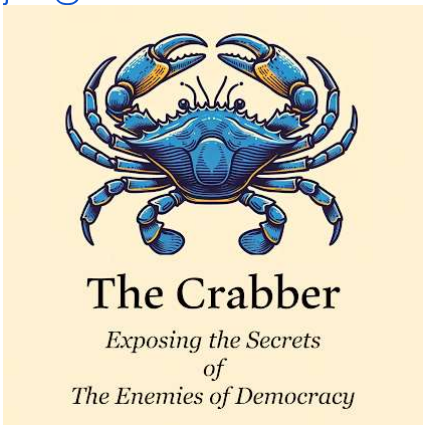
Communications Department,
Pinellas County Supervisor of Elections Office

John Liccione <john@thecrabber.com> Fri, Aug 30, 2024 at 7:48 PM
To: Christopher Gleason <GleasonForPinellas@gmail.com>

Hi Chris,

I just submitted this laser-focused record request on source IP addresses of 6/23 ballot-requesters to the SOE in my persona as CEO of my new media company, "The Crabber," which I just incorporated on 8/15/24.

John Liccione
Founder and CEO
The Crabber News, LLC
thecrabber.com
john@thecrabber.com



[Quoted text hidden]

Smith, Matt <masmith@votepinellas.gov> Tue, Sep 17, 2024 at 10:07 AM
To: "john@thecrabber.com" <john@thecrabber.com>
Cc: publicrecordsrequest <publicrecordsrequest@votepinellas.gov>

Mr. Liccione,

We have no records responsive to your request.

Thanks,

Matt Smith

General Counsel

Representing Julie Marcus, Supervisor of Elections

13001 Starkey Rd., Largo, FL 33773

(727) 464-5751

masmith@votepinellas.gov

Find us on Facebook ~ Follow us @VotePinellas

Under Florida law, email addresses are public records. If you do not want your email address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. -- F.S. 668.6076

Conforme a la legislación de Florida, las direcciones de correo electrónico son registros públicos. Si no desea que su correo electrónico se divulgue como respuesta a una solicitud de registros públicos, no envíe un correo electrónico a esta entidad. En su lugar, póngase en contacto con esta oficina por teléfono o por escrito. -- F.S. 668.6076

From: publicrecordsrequest <publicrecordsrequest@votepinellas.gov>
Sent: Friday, August 30, 2024 7:33 PM
To: john@thecrabber.com
Subject: Public Records Request: 2024-392 from John Liccione

Dear John Liccione,

[Quoted text hidden]

John Liccione <john@thecrabber.com> Tue, Sep 17, 2024 at 6:33 PM
To: "Smith, Matt" <masmith@votepinellas.gov>
Cc: publicrecordsrequest <publicrecordsrequest@votepinellas.gov>

Mr Smith,

I'd like to schedule a meeting with you and whomever on PSOE staff you deem appropriate on this records request at your earliest convenience.
Please let me know if you're willing to discuss this matter at your offices and if so, when.

Regards,

John Liccione
[Quoted text hidden]

Smith, Matt <masmith@votepinellas.gov> Wed, Sep 18, 2024 at 1:58 PM
To: John Liccione <john@thecrabber.com>
Cc: publicrecordsrequest <publicrecordsrequest@votepinellas.gov>

Mr. Liccione –

As we have provided you with a response to your public records request, we consider the request complete and the matter closed.

Since you have made this public records request an issue in your current lawsuit against this office (24-003939-CI), please refer all future correspondence regarding this matter to our litigation attorneys.

Thank you,

Matt Smith

General Counsel

Representing Julie Marcus, Supervisor of Elections

13001 Starkey Rd., Largo, FL 33773

(727) 464-5751

masmith@votepinellas.gov

Find us on Facebook ~ Follow us @VotePinellas

Under Florida law, email addresses are public records. If you do not want your email address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. -- F.S. 668.6076

Conforme a la legislación de Florida, las direcciones de correo electrónico son registros públicos. Si no desea que su correo electrónico se divulgue como respuesta a una solicitud de registros públicos, no envíe un correo electrónico a esta entidad. En su lugar, póngase en contacto con esta oficina por teléfono o por escrito. -- F.S. 668.6076

[Quoted text hidden]

Tab L - Citizen Grand Jury Requests: Sworn elector and candidate petitions under § 104.43

EXHIBIT M:

200+ Grand Jury Investigation Requests (Fla. Stat. § 104.43)
Submitted to 6th Circuit Court Chief Judge Shawn Crane

Voter Name: SIRENA PELLARO

Voter Address: 214 DOGWOOD CIR.

Voter City, State, Zip Code: SEMINOLE

Voter Email Address: SIRENAPELLARO@GMAIL.COM

Voter Cell Phone Number: 619-389-8939

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, SIRENA PELLARO a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature
Voter Name: SIRENA PELLARO

Voter Name: Dawn M Simmons

Voter Address: 1001 142 Ave N #215

Voter City, State, Zip Code: Largo FL 33771

Voter Email Address: Simmonsd44@gmail.com

Voter Cell Phone Number: 727-251-3728

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Dawn M. Simmons a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x Dawn M Simmons

Voter Signature
Voter Name: Dawn M Simmons

Lissy 2/16/24
5552 173 39 6860
Exp 9/1/24

Voter Name: Janelle MaKowski

Voter Address: 1793 Harbor Drive

Voter City, State, Zip Code: Clearwater, FL 33755

Voter Email Address: JMaKowsK@tampabay.rr.com

Voter Cell Phone Number: 727 420 9701

DATE: 02.27.2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Janelle MaKowski a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature

Voter Name: Janelle S MaKowski

Voter Name: Franja Eastling

Voter Address: 424 Country Club Dr

Voter City, State, Zip Code: Oldsmar, FL 34677

Voter Email Address: franjaeastling@yahoo.com

Voter Cell Phone Number: 727-945-3181

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Franja Eastling, a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Franja Eastling

Voter Signature
Voter Name: Franja Eastling

Voter Name: Michele Petsche

Voter Address: 1541 Carroll St.

Voter City, State, Zip Code: Clwt. FL 33755

Voter Email Address: M.petsche@hotmail.com

Voter Cell Phone Number: 727-259-4678

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Michele Petsche a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Michele Petsche

Voter Signature
Voter Name: Michele Petsche

Voter Name: Christine Clure

Voter Address: 2270 Citrus Valley Circle

Voter City, State, Zip Code: Palm Harbor, FL 34683

Voter Email Address: Threebikechris@Aol.com

Voter Cell Phone Number: 727-505-1967

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Christine Clure a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X Christine Clure

Voter Signature

Voter Name: Christine Clure

Voter Name: Karol Kay Pravda

Voter Address: 1500 Edna Ave. NW

Voter City, State, Zip Code: Largo, FL 33770

Voter Email Address: kpravda@me.com

Voter Cell Phone Number: (727) 612-6165

DATE: 1/20/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Karol Kay Pravda a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Karol Kay Pravda

Voter Signature

Voter Name: Karol Kay Pravda

Voter Name: Eileen Posch

Voter Address: 1140 S. Pointe Alexis DR

Voter City, State, Zip Code: TARPON SPRINGS FL 34689

Voter Email Address: eposch@gmail.com

Voter Cell Phone Number: 718 - 612 - 4535

DATE: 2/28/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Eileen Posch a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X Eileen Posch

Voter Signature
Voter Name: EILEEN POSCH

Voter Name: Ricky L. CLURE

Voter Address: 2270 Citrus Valley Cir

Voter City, State, Zip Code: Palm Harbor, FL. 34683

Voter Email Address: Largoricky@AOL.com

Voter Cell Phone Number: 727-271-5951

DATE: 2-21-24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Ricky L. CLURE a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X Ricky L. Clure

Voter Signature

Voter Name: Ricky L. CLURE

Voter Name: Elizabeth T Shreero

Voter Address: 6251 Shoreline Drive #2201

Voter City, State, Zip Code: St Petersburg 33708

Voter Email Address: BShreero@aol.com

Voter Cell Phone Number: (727) 418-6122

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Elizabeth Shreero a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Elizabeth T. Shreero

Voter Signature

Voter Name: Elizabeth T. Shreero

Voter Name: Krista Kosier

Voter Address: 13302 Whispering Palms Pl SW #1202

Voter City, State, Zip Code: Largo FL 33774

Voter Email Address: sugarshorts22165@gmail.com

Voter Cell Phone Number: (727) 798-0972

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Krista Kosier a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: Krista Kosier

Voter Name: Cheryl Revell

Voter Address: 910 Laura St, Clearwater, FL

Voter City, State, Zip Code: 33755

Voter Email Address: Chrlrvll@gmail.com

Voter Cell Phone Number: 727-276-2177

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: 13805 58th St N, Unit 2200 Largo FL 33760
Clerk of Court City, State, Zip Code:

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Cheryl Revell a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X Cheryl Revell

Voter Signature
Voter Name: Cheryl Revell

Voter Name: WESLEY BROWN

Voter Address: 7384 WINDSOR LANE

Voter City, State, Zip Code: CLEARWATER, FLA 33764

Voter Email Address: wesleydbrown@yahoo.com

Voter Cell Phone Number: 727-543-4295

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL.

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, WESLEY D. BROWN, a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Wesley D. Brown. Date: 3-28-24

Voter Signature
Voter Name: WESLEY D. BROWN

Voter Name: Karen Panarelli

Voter Address: 746 Wildewood Drive

Voter City, State, Zip Code: Palm Harbor, FL 34683

Voter Email Address: karenpanarelli@bloomin brand.com

Voter Cell Phone Number: 727. 798 8283

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: 14250 49th St N
Clerk of Court City, State, Zip Code: Clearwater, FL 33762

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Karn Panarelli a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL.

Sincerely,

x Ka D. Panarelli

Voter Signature

Voter Name: Karen D. Panarelli

Voter Name: Debra Lewis

Voter Address: 1448 Seagull Dr #202

Voter City, State, Zip Code: Palm Harbor FL 34685

Voter Email Address: dlh957@juno.com

Voter Cell Phone Number: 7272701405

Pinellas County Grand Jury Members
Clerk of Court Address: 14250 49th St N
Clerk of Court City, State, Zip Code: Clearwater, FL 33762

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Debra Lewis a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X Debra Lewis Date: 4-23-24

Voter Signature
Voter Name: Debra Lewis

Voter Name: Elizabeth Galvin

Voter Address: 2672 Walnut Dr. Palm Harbor

Voter City, State, Zip Code: Palm Harbor FL 34683

Voter Email Address: elizabethrosegalvin@gmail.com

Voter Cell Phone Number: 727-738-8732

DATE: 2/27/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Elizabeth Galvin a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

x Elizabeth Galvin

Voter Signature
Voter Name: Elizabeth Galvin

Voter Name: Steven Tonnesen

Voter Address: 122.. Kendale Dr

Voter City, State, Zip Code: Safety Harbor, FL 34695

Voter Email Address: steve.tonnesen@gmail

Voter Cell Phone Number: 727 688 8936

DATE: 02/27/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Steven Tonnesen, a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature
Voter Name: STEVEN PAUL TONNESEN

Voter Name: VALERIA NIXON

Voter Address: 601 12th Ave. NE #2

Voter City, State, Zip Code: St. Petersburg, FL 33701

Voter Email Address: Vnixonfla@gmail.com

Voter Cell Phone Number: 727-656-6400

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Valeria Nixon a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Valeria Nixon

Voter Signature
Voter Name: Valeria Nixon

NOTARY PUBLIC STATE OF FLORIDA
Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

N250-863-57-530-0
ALissy 2/16/24
Exp. 9/1/24

Voter Name: MAUREEN ZILLES

Voter Address: 8392 Meadowbrook Dr East

Voter City, State, Zip Code: LARGO, FL. 33777

Voter Email Address: zillesmaureen@yahoo.com

Voter Cell Phone Number: (201) 233-1059

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, MAUREEN ZILLES a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x Maureen Zilles

Voter Signature
Voter Name: MAUREEN ZILLES

Amber Lissy 2/16/24
Exp. 9/1/24
Personally known

Voter Name: Sylvia P. Venuto

Voter Address: 10500 Village Dr. 201

Voter City, State, Zip Code: Seminole, FL 33772

Voter Email Address: Sylvia.Venuto@protonmail.com

Voter Cell Phone Number: 319-651-6708

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Sylvia Venuto a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

NOTARY PUBLIC STATE OF FLORIDA
Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X _____

Voter Signature
Voter Name: Sylvia Venuto

V530-791-62-639-0
Amber Lissy 2/16/24
Exp. 9/1/24

Voter Name: Americo Veneto

Voter Address: 10500 Village Drive, Seminole Florida 33772

Voter City, State, Zip Code: _____

Voter Email Address: _____

Voter Cell Phone Number: 319 440 0052

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, A.J. Veneto a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: Americo Veneto

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Exp. 9/1/24

2/16/24

Voter Name: BARBARA STARK

Voter Address: 5817 21ST AVE. S

Voter City, State, Zip Code: GULFPORT, FL 33707

Voter Email Address: BSTARCATS@PROTONMAIL.COM

Voter Cell Phone Number: 917-836-0654

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, BARBARA STARK a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

NOTARY PUBLIC STATE OF FLORIDA
Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X Barbara Stark

Voter Signature

Voter Name: BARBARA STARK

S362-072-48-809-0
Amber Lissy 2/16/24
Exp 9/1/24

Voter Name: Jeffery B Hobs

Voter Address: 3824 90th Ter N

Voter City, State, Zip Code: Pinellas Park FL 33782

Voter Email Address: IdeaSolutions@aol.com

Voter Cell Phone Number: 612.408.6500

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

RE:

Dear Pinellas County Members of the Grand Jury,

I, Jeffery B. Hobs a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X _____

Voter Signature

Voter Name: Jeffery B Hobs

A Lissy 2/16/24
Exp. 9/1/24

Voter Name: Scott Johnson

Voter Address: 1321 S. Betty Ln

Voter City, State, Zip Code: Clearwater, FL 33756

Voter Email Address: scautib2manti@gmail.com

Voter Cell Phone Number: 727 396 6556

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Scott D. Johnson a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: Scott Johnson

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

J525-784-63-082-1
Amber Lissy 2/16/24
Exp 9/24

Voter Name: Clifford A. GEPHART

Voter Address: 1485 45th Ave NE

Voter City, State,Zip Code: St Pete FL 33703

Voter Email Address: CliffgepHART@gmail.com

Voter Cell Phone Number: 727-420-0789

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Clifford GepHART a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

NOTARY PUBLIC STATE OF FLORIDA
Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X _____

Voter Signature
Voter Name: Clifford GepHART

G163-101-70-254-0
Lissy 2/16/24
EXP 9/24

Voter Name: Linda Skempris

Voter Address: 8043 Causeway BLVD

Voter City, State, Zip Code: St. Petersburg, FL. 33707

Voter Email Address: Lskempri@Tampabay.rr.com

Voter Cell Phone Number: 386-347-3239

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Linda Skempris a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x Linda Skempris

Voter Signature
Voter Name: Linda Skempris

S516-538-43-642-0
Amber Lissy 2/16/24
Exp 9/24

Voter Name: Sherry Kent

Voter Address: 9160 35 St. N Pinellas Park, FL

Voter City, State, Zip Code: 33782

Voter Email Address: Skent.sherry@gmail.com

Voter Cell Phone Number: 253-970-8969

DATE: 2/27/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Sherry Kent a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X Sherry L Kent

Voter Signature

Voter Name: Sherry L. Kent

Voter Name: JULIA K. MARQUARDT

Voter Address: 415 ROEBLING RD S

Voter City, State, Zip Code: BELLEAIR, FL 33756

Voter Email Address: JULIAM1224 ● YAHOO.COM

Voter Cell Phone Number: 727-743-6587

DATE: 3/1/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, JULIA K MARQUARDT a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: JULIA K MARQUARDT

Voter Name: Sonja Snyder

Voter Address: 12402 92 Terr.

Voter City, State, Zip Code: Seminole FL 33772

Voter Email Address: Sonjafinch@Aol.com

Voter Cell Phone Number: 727 686 1407

DATE: 2-27-24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Sonja Snyder a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doeco-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

i believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X Sonja Snyder

Voter Signature

Voter Name: Sonja Snyder

Voter Name: JUDITH Joseph Snyder

Voter Address: 2605 Alexander Pl #101

Voter City, State, Zip Code: Clearwater FL 33763

Voter Email Address: judi@homestretchfinancial.com

Voter Cell Phone Number: 727-421-7624

DATE: 3/1/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, JUDITH Joseph Snyder a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: JUDITH Joseph Snyder

Voter Name: Jo Anne Marshall

Voter Address: 8851 US Highway 19N, Apt 112-0

Voter City, State, Zip Code: Pinellas Park, FL 33782

Voter Email Address: joamarshall53@gmail.com

Voter Cell Phone Number: 954-482-1492

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Jo Anne Marshall a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X Jo Anne Marshall

Voter Signature
Voter Name: Jo Anne Marshall

M624-431-53-840-0
Amber Lissy 2/16/24
Exp 9/1/24

Voter Name: JAMES M. BROWN JR

Voter Address: 100 BLUFF VIEW DR.

Voter City, State, Zip Code: BELLEAIR BLUFFS FL

Voter Email Address: JM.BROWN.CGR@gmail.com

Voter Cell Phone Number: 501 454 9575

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, JIM BROWN JR a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x James Brown JR

Voter Signature
Voter Name: JAMES BROWN JR

B650-453-47-4450
A Lissy 2/16/24
Exp 9/1/24

Voter Name: Suzanne Bourdeau

Voter Address: 1024 Woodbrook Dr. S.

Voter City, State, Zip Code: Largo, FL 33770

Voter Email Address: sbourdeau01@gmail.com

Voter Cell Phone Number: 727-709-9255

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Suzanne Bourdeau qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether suffiicient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x Suzanne Bourdeau

Voter Signature
Voter Name: Suzanne Bourdeau

B630-780-53-836-0
A Lissy 9/1/24
2/16/24

Voter Name: Romain Zwissler

Voter Address: 10913 124th ave N

Voter City, State, Zip Code: Largo FL 33778

Voter Email Address: MonaZwissler@Hotmail.com

Voter Cell Phone Number: 727-686-8077

Pinellas County Grand Jury Members
Clerk of Court Address: 14250 49th St N
Clerk of Court City, State, Zip Code: Clearwater, FL 33762

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Romain Zwissler qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL
CP

Thank you for your attention to this matter.

Sincerely,
X Romain Zwissler Date: 4-23-24

Voter Signature
Voter Name: Romain J Zwissler

Voter Name: CATHI CHAMBERLAIN

Voter Address: 10520 SAN FERNANDO BLVD NE

Voter City, State, Zip Code: ST. PETERSBURG FL 33702

Voter Email Address: cathichamberlain2022@gmail.com

Voter Cell Phone Number: 727.320.7746

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

RE:

Dear Pinellas County Members of the Grand Jury,

I, CATHI CHAMBERLAIN a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: CATHI CHAMBERLAIN

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Lissy 2/16/24
Exp. 9/1/24
Personally Known

Voter Name: Christine M. Peters

Voter Address: 1321 Arden Ave

Voter City, State, Zip Code: Clearwater, FL 33755

Voter Email Address: Cliff.tinapeters@gmail.com

Voter Cell Phone Number: 727-458-6785

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

RE:

Dear Pinellas County Members of the Grand Jury,

I, Christine M. Peters a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

NOTARY PUBLIC STATE OF FLORIDA
Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x Christine M. Peters

Voter Signature
Voter Name: Christine M. Peters

Lissy 9/16/24
Exp. 9/1/24
Personally Known

Voter Name: Pamela le Clair

Voter Address: 2071 Forest Dr.

Voter City, State, Zip Code: Clearwater, Fl. 33763

Voter Email Address: pammy21252@yahoo.com

Voter Cell Phone Number: 727-259-3546

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Pamela. le Clair a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X Pamela Le Clair

Voter Signature
Voter Name: Pamela le Clair

L246735255520
Lissy 2/16/24
Exp. 9/1/24

Voter Name: LouAnn Rice

Voter Address: 1209 E Bayou St.

Voter City, State, Zip Code: Tarpon Springs 34689

Voter Email Address: LouAnnRicereagent@gmail.com

Voter Cell Phone Number: 727-946-2269

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: 14250 49th St N
Clerk of Court City, State, Zip Code: Clearwater, FL 33762

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, LouAnn M Rice a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL.
CP

Sincerely,

x LouAnn M Rice

Voter Signature

Voter Name: LouAnn M Rice

Voter Name: Raymond Zwissler

Voter Address: 10913 124th Ave N

Voter City, State, Zip Code: Largo FL

Voter Email Address: RayZwissler@Gmail.com

Voter Cell Phone Number: 727-967-6184

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: 14250 49th St N
Clerk of Court City, State, Zip Code: Clearwater, FL 33762

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Raymond Zwissler a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature
Voter Name: Raymond Zwissler

Voter Name: Nancy Skinner Ericsson

Voter Address: 1449 Ridge Shore Dr

Voter City, State, Zip Code: Tarpon Springs, Fl 34689

Voter Email Address: nskinnerericsson@yahoo.com

Voter Cell Phone Number: 727-741-1297

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

RE:

Dear Pinellas County Members of the Grand Jury,

I, Nancy SkinnerEricsson qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

NOTARY PUBLIC STATE OF FLORIDA
Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X _____

Voter Signature
VoterName: Nancy Skinner-Ericsson

Lissy 2/16/24
Exp. 9/1/24
Personally Known

Voter Name: SOCRATES A. CHAROS

Voter Address: 1916 LOMBARDY DR. CLEARWATER

Voter City, State, Zip Code: 33755

Voter EmailAddress: SOCRATESCHAROS@GMAIL.COM

Voter Cell Phone Number: 724-458-2569

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

RE:

Dear Pinellas County Members of the Grand Jury,

I, SOCRATES A. CHAROS qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X _____

Voter Signature
Voter Name: SOCRATES A. CHAROS

C620 780471760
Lissy 9/16
Exp. 9/1/24

Voter Name: DAVID TROUTMAN

Voter Address: 16450 Gulf Blvd, 565

Voter City, State, ZipCode: N Redington Bch FL 33708

Voter Email Address: dht101@outlook.com

Voter Cell Phone Number: 412-759-9000

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, David Troutman a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X David Troutman

Voter Signature
Voter Name: David Troutman

A Lissy 6/16/24
T635-168-58-023-0
Exp 9/1/24

Voter Name: Gina M Mirelli

Voter Address: 1161 NE Cleveland St #2

Voter City, State, Zip Code: Clearwater, FL 33755

Voter Email Address: gfrystak@yahoo.com

Voter Cell Phone Number: 727-256-2991

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Gina Mirelli a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Gina M. Mirelli

Voter Signature

Voter Name: Gina M Mirelli

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

M400-293-71-664-0
Lissy 2/16/24
Exp. 9/1/24

Voter Name: PATRICK OLIVER

Voter Address: 1317 SANDS TERRACE EAST #305

Voter City, State, Zip Code: CLEARWATER, FL 33764

Voter Email Address: PATRICKTHEMUSH@AOL.COM

Voter Cell Phone Number: 727-422-2476

DATE: 20 FEB 2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Patrick Oliver a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: PATRICK S. OLIVER

Voter Name: BRUCE B. NASH

Voter Address: 2712 5TH CT.

Voter City, State, Zip Code: PALM HARBOR, FL 34684

Voter Email Address: NASHBB@LIVE.COM

Voter Cell Phone Number: (508) 737-1294

DATE: 3/13/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, BRUCE NASH a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Bruce B. Nash

Voter Signature

Voter Name: BRUCE NASH

Voter Name: Susan Orneck

Voter Address: 36150 US Highway 19 N

Voter City, State, Zip Code: P.H., FL 34684

Voter Email Address: susan@susanorneck.com

Voter Cell Phone Number: 727-434-9999

DATE: 3/5/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Susan Orneck a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: Susan Orneck

Voter Name: Mary Lynn Mudler

Voter Address: 1206 Cara Dr.

Voter City, State, Zip Code: Largo FL 33771

Voter Email Address: mrmudler@gmail.com

Voter Cell Phone Number: 727 686 7876

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Mary Lynn Mudler a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X Mary Lynn Mudler

Voter Signature

Voter Name: Mary Lynn Mudler

Voter Name: Paul D Meisgeier

Voter Address: 7848 39th AVE N.

Voter City, State, Zip Code: St. Pete. Fla. 33709

Voter Email Address: None

Voter Cell Phone Number: 727-709 5956

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

RE:

Dear Pinellas County Members of the Grand Jury,

I, Paul D Meisgeier a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x Paul D Meisgeier

Voter Signature

Voter Name: Paul D Meisgeier

M260 684-52-129-0
Amber Lissy 2/16/24
Exp. 9/1/24

Voter Name: Patrick K A. Narog

Voter Address: 5950 102nd Ave

Voter City, State, Zip Code: Pinellas Park Fl. 33782

Voter Email Address: _____

Voter Cell Phone Number: 727-596-3831

DATE: 2/20/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Patrick Narog a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X Patrick Narog

Voter Signature

Voter Name: Patrick A. Narog

Voter Name: Pamela Newstedt

Voter Address: 5970 80TH ST N.

Voter City, State, Zip Code: ST. Petersburg FL

Voter Email Address: pnewstedt@gmail.com

Voter Cell Phone Number: _____

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Pamela Newstedt a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X Pamela Newstedt

Voter Signature

Voter Name: Pamela Newstedt

Voter Name: Christopher Jon Williams

Voter Address: 1975 West Bay Drive #506

Voter City, State, Zip Code: Largo FL 33770

Voter Email Address: cjwill1981@gmail.com

Voter Cell Phone Number: 727 558-7872

DATE: 2-20-24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Christopher Williams a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature
Voter Name: Christopher Williams

Voter Name: Jon Williams

Voter Address: 9450 Harbor Greens Way #502

Voter City, State, Zip Code: Seminole, FL. 33776

Voter Email Address: jwi7781@gmail.com

Voter Cell Phone Number: 727-430-3287

DATE: Feb 20, 2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Jon R. Williams a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature Jon R. Williams

Voter Name: Jon R. Williams

Voter Name: Dorothy M. Williams

Voter Address: 1486 Manatee Circle

Voter City, State, Zip Code: Tarpon Springs, Fl. 34689

Voter Email Address: Same

Voter Cell Phone Number: 727-608-7357

DATE: 3/1/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Dorothy M. Williams a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Dorothy M. Williams

Voter Signature
Voter Name: Dorothy M. Williams

Voter Name: MARK WASH

Voter Address: 1337 CANTERBURY RD NO

Voter City, State, Zip Code: St. Pete, FL 33710

Voter Email Address: MWash1337@tampabay.rr.com

Voter Cell Phone Number: 727-742-8713

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, MARK WASH a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X MH Wash Date: 3-27-2024

Voter Signature
Voter Name: MARK H. WASH

Voter Name: Ronda Wessler

Voter Address: 2014 58th Ln N

Voter City, State, Zip Code: Clearwater, FL 33760

Voter Email Address: relista@yahoo.com

Voter Cell Phone Number: 7272657233

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Ronda Wessler, a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X _____

Voter Signature

Voter Name: Ronda Wessler

W246-721-68-833-0
Expires 9/24
Amber Lissy
2/16/24

Voter Name: Jennifer Wingfield

Voter Address: 707 Fairwood Dr.

Voter City, State, Zip Code: Clw, FL 33759

Voter Email Address: jencam clear@gmail.com

Voter Cell Phone Number: 813-597-9083

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Jennifer Wingfield a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X _____

Voter Signature

Voter Name: Jennifer Wingfield

W521-430-52-942-0

A Lissy 2/16/24

EXP. 9/1/24

Voter Name: DAVID C. WHITE

Voter Address: 3395 JANGLEWOOD TRAIL

Voter City, State, Zip Code: PALM HARBOR, FL 34685

Voter Email Address: DCALVINWHITE@YAHOO.COM

Voter Cell Phone Number: 727-560-3131

DATE: FEB 26, 2024

X Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, DAVID WHITE a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X David C. White

Voter Signature
Voter Name: DAVID C. WHITE

Voter Name: Lugene Azar

Voter Address: 11276 106 Ave

Voter City, State, Zip Code: Seminole, FL 33778

Voter Email Address: lugene56@yahoo.com

Voter Cell Phone Number: 727-504-5568

DATE: 3/5/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL.

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Lugene Azar a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Lugene Azar

Voter Signature

Voter Name: Lugene Azar

Voter Name: Kim Allison

Voter Address: 2800 Cove Cay Dr.

Voter City, State, Zip Code: Clearwater, FL.

Voter Email Address: Kimba428@AOL.COM

Voter Cell Phone Number: 267-228-9927

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I Kim Allison a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

Kim Allison

Voter Signature

Voter Name: KIM ALLISON

Voter Name: Sheryl Arbogast

Voter Address: 9300 Gulf Blvd

Voter City, State, Zip Code: St Pete Beach, FL 33706

Voter Email Address: Sheryl.arbogast@gmail.com

Voter Cell Phone Number: (513) 846-4479

DATE: 2/20/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Sheryl Arbogast, a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Sheryl Arbogast

Voter Signature

Voter Name: Sheryl Arbogast

Voter Name: Linda Berglund

Voter Address: 100 Bluffview Dr 402C

Voter City, State, Zip Code: Belleair Bluffs FL 33770

Voter Email Address: d7 lindberg@yahoo.com

Voter Cell Phone Number: 727-412-5908

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I Linda Berglund a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X Linda Berglund

Voter Signature
Voter Name: LINDA BERGLUND

Voter Name: Catherine H. Barber

Voter Address: 2205 Webb Avenue #101

Voter City, State, Zip Code: Clearwater, FL. 33767

Voter Email Address: cathyb904@gmail.com

Voter Cell Phone Number: 727 433-1501

DATE: 3/1/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Catherine H. Barber, qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Catherine H Barber

Voter Signature

Voter Name: Catherine H. Barber

Voter Name: GEORGE BACHMANN

Voter Address: 2968 MACALPIN DRIVE N.

Voter City, State, Zip Code: PALM HARBOR FLA 34684

Voter Email Address: GEOBACH4@GMAIL.COM

Voter Cell Phone Number: 516 993-1088

DATE: 2/29/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

X Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, GEORGE BACHMANN a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: GEORGE BACHMANN

Voter Name: WESLEY BROWN

Voter Address: 7384 WINDSOR LANE

Voter City, State, Zip Code: CLEARWATER, FLA 33764

Voter Email Address: wesleydbrown@yahoo.com

Voter Cell Phone Number: 727-543-4295

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL.

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, WESLEY D. BROWN a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Wesley D. Brown. Date: 3-28-24

Voter Signature
Voter Name: WESLEY D. BROWN

Voter Name: MICHELLE WHITE

Voter Address: 515 41ST AVE N

Voter City, State, Zip Code: ST PETERSBURG FL 33703

Voter Email Address: MWHITECREW@gmail.com

Voter Cell Phone Number: 727-466-8274

DATE: 2/25/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, MICHELLE WHITE a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Michelle White

Voter Signature
Voter Name: MICHELLE WHITE

Voter Name: DAVID TROUTMAN

Voter Address: 16450 Gulf Blvd, 565

Voter City, State, Zip Code: N Redington Bch FL 33708

Voter Email Address: dht 101 @ outlook.com

Voter Cell Phone Number: 412-759-9000

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, David Troutman a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x David Troutman

Voter Signature
Voter Name: David Troutman

A Lissy 2/16/2
T635-168-58-023-0
Exp 9/1/24

Voter Name: James/Janet Perry

Voter Address: 1816 Golf View Dr.

Voter City, State, Zip Code: Tarpon Springs FL

Voter Email Address: jperry6181@aol.com

Voter Cell Phone Number: 4147505981

DATE: 2/20/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, James Perry a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: James Perry

Voter Name: Mary Parker

Voter Address: 250 Rosery Rd NW Unit 307

Voter City, State, Zip Code: Largo FL 33770

Voter Email Address: delightfulcards28@yahoo.com

Voter Cell Phone Number: 727-452-4808

DATE: 2/28/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Mary Parker a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

i believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Mary Parker

Voter Signature

Voter Name: Mary Parker

Voter Name: MARYANN ORTENZIO

Voter Address: 1044 Sunset Point Rd

Voter City, State, Zip Code: Clearwater FL 33755

Voter Email Address: ORTENZIO8888@gmail.com

Voter Cell Phone Number: 727-3091361

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Maryann Adams a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X Maryann Adams

Voter Signature

Voter Name: Maryann Adams MARYANN ORTENZIO

0635-540-61828-0
Lissy 9/1/24
Exp 9/1/24

Voter Name: James K. Mott

Voter Address: 29250 US HWY 19 N

Voter City, State, Zip Code: Clearwater, FL 33761

Voter Email Address: jandsmott@gmail.com

Voter Cell Phone Number: 727-422-6919

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

RE:

Dear Pinellas County Members of the Grand Jury,

I, James K. Mott a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

M 300451632660

2/16/24

Exp. 9/1/24

Sincerely,

X James K Mott

Voter Signature

Voter Name: James K. Mott

Voter Name: Sharon Mott

Voter Address: 29250 US Highway 19 N. Lot 308

Voter City, State, Zip Code: Clearwater, FL. 33761

Voter Email Address: smott4451@gmail.com

Voter Cell Phone Number: 860 941 2464

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE:

Dear Pinellas County Members of the Grand Jury,

I, Sharon Mott a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x Sharon Mott

Voter Signature

Voter Name: Sharon Mott

Alissy 2/16/24
Exp. 9/1/24
Personally Known

Voter Name: Gary Posch

Voter Address: 1140 S. Pointe Hexis Dr.

Voter City, State, Zip Code: Tarpon Springs

Voter Email Address: grposch83@gmail.com

Voter Cell Phone Number: 718-551-4253

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Gary Posch a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X _____

Voter Signature

Voter Name: Gary Posch

A Lissy 2/16/24
Exp. 9/1/24
personally Known

Voter Name: RICHARD GREENWOOD

Voter Address: 105 HARBOR BLUFF DR

Voter City, State, Zip Code: LARGO, FL 33770

Voter Email Address: NTADVISORS@GMAIL.COM

Voter Cell Phone Number: 951-375-9683

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, RICHARD GREENWOOD a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X RMG

Voter Signature

Voter Name: RICHARD GREENWOOD

9653 7535 1 4460

A Lissy 6/16/24
Exp. 9/1/24

Voter Name: Keith L. Eshelman

Voter Address: 2430 Brazilia Dr Apt. 4

Voter City, State, Zip Code: Clearwater, FL 33763

Voter Email Address: Keith_L_Eshelman@juno.com

Voter Cell Phone Number: 813-949-7583

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Keith L. Eshelman, a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x Keith L. Eshelman

Voter Signature
Voter Name: Keith L. Eshelman

E245 513 48 3640
A Lissy 2/16/2
Exp. 9/1/24

Voter Name: Lisa Repetto

Voter Address: 4962 Kylemore Ct

Voter City, State, Zip Code: Palm Harbor, FL 34685

Voter Email Address: lisa@lisarepetto.com

Voter Cell Phone Number: 650-799-2236

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Lisa Repetto a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

NOTARY PUBLIC STATE OF FLORIDA
Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x _____

Voter Signature
Voter Name: Lisa Repetto

Lissy 2/16/24
personally known
exp. 9/1/24

Voter Name: Marianne Segal

Voter Address: 2416 World Parkway Blvd #114

Voter City, State, Zip Code: Clearwater, FL 33763

Voter Email Address: hm4hands@mail.com

Voter Cell Phone Number: 727-439-6670

DATE: 2/23/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Marianne Segal a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: Marianne Segal

Voter Name: CONNIE STEELE

Voter Address: 11564 SHORT AVE

Voter City, State, Zip Code: LARGO, 33774

Voter Email Address: CONNIESTEELE249@GMAIL.COM

Voter Cell Phone Number: 727-510-9586

DATE: 3-1-2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, CONNIE STEELE a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Connie Steele

Voter Signature
Voter Name: CONNIE STEELE

Voter Name: Martha Scott

Voter Address: 105 Harbor Bluff Dr.

Voter City, State, Zip Code: Largo, FL 33770

Voter Email Address: Rentals951@gmail.com

Voter Cell Phone Number: 951-760-3399

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Martha Scott a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

x Martha A Scott

Voter Signature
Voter Name: Martha A Scott

Voter Name: Sheila J Simmons

Voter Address: 5970 80th St. N. #115

Voter City, State, Zip Code: St. Petersburg, FL. 33709

Voter Email Address: shelaslight@gmail.com

Voter Cell Phone Number: 727-900-3168

DATE: Feb. 20, 2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Sheila Simmons a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

Voter Signature

Voter Name: Sheila J Simmons

Voter Name: JAMES STRATTON

Voter Address: 2106 DREW ST #104

Voter City, State, Zip Code: CLWTR, FL 33765

Voter Email Address: JWSTRATTON1@MSN.COM

Voter Cell Phone Number: 727-410-6758

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, JAMES STRATTON a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature

Voter Name: JAMES STRATTON

Voter Name: Vernon Verigan

Voter Address: 10630-95ST-N

Voter City, State, Zip Code: SEMINOLE, FL 33777

Voter Email Address: VernonVerigan@gmail.com

Voter Cell Phone Number: 727-4830616

DATE: 2-27-24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Vernon Verigan a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: VERNON VERIGAN

Voter Name: Debra Vogt

Voter Address: 1911 66th St. N Lot 654

Voter City, State, Zip Code: Largo, FL 33773

Voter Email Address: debramorgan322@gmail.com

Voter Cell Phone Number: 727-685-9566

DATE: 3-18-2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Debra Vogt a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: Debra Vogt

Voter Name: Shirley L. Vick

Voter Address: 717 - 13th CT SW

Voter City, State, Zip Code: Largo, FL 33770

Voter Email Address: Dvick@aol.com

Voter Cell Phone Number: 7274230508

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code:_____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Shirley L. Vick a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,
X Shirley L. Vick

Voter Signature
Voter Name: Shirley L. Vick

Voter Name: Suzan STEYER

Voter Address: 2904 St JOHN DR

Voter City, State, Zip Code: CLW FL 33759

Voter Email Address: _____

Voter Cell Phone Number: 727 742 7240

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE:

Dear Pinellas County Members of the Grand Jury,

I, Suzan Steyer a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X Suzan Steyer

Voter Signature
Voter Name: Suzan Steyer

S360 792637140
Alissy 2/16/24
Exp. 9/1/24

Voter Name: Mitchell T. Schleede

Voter Address: 9651 26th Ave North

Voter City, State, Zip Code: St. Petersburg, FL 33713

Voter Email Address: mitchschleede@yahoo.com

Voter Cell Phone Number: 727-225-5495

DATE: 2/27/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Mitchell T Schleede a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: Mitchell T. Schleede

Voter Name: Kathryn H. Smith

Voter Address: 200 Velma Dr W

Voter City, State, Zip Code: Largo FL 33770

Voter Email Address: Kathy.Smith0818@gmail.com

Voter Cell Phone Number: 727 585 7159

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Kathryn H Smith a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X Kathryn H Smith

Voter Signature
Voter Name: Kathryn H. Smith

Voter Name: Ron Sanders

Voter Address: 11430 Canterbury Ln

Voter City, State, Zip Code: Seminole FL 33778

Voter Email Address: Ronnsanders@gmail.com

Voter Cell Phone Number: 727 803 6030

DATE: 2/20/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

Ron Sanders a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Ron Sanders

Voter Signature
Voter Name: Ron Sanders

Voter Name: Karen Allison Schmidt

Voter Address: 2621 Cove Cay Dr #509

Voter City, State, Zip Code: Clearwater, FL 33760

Voter Email Address: tymtrav777@gmail.com

Voter Cell Phone Number: (484)364-1046

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Karen Allison Schmidt a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Karen Allison Schmidt

Voter Signature
Voter Name: Karen Allison Schmidt

Voter Name: MARY KIMBERLY SCHMIDT

Voter Address: 7100 ULMERTON RD # ~~A100~~ 2129

Voter City, State, Zip Code: LARGO FL 33773

Voter Email Address: KimberlySchmidt.me@gmail.com

Voter Cell Phone Number: 7274038517

DATE: 3.17.24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, MARY KIMBERLY SCHMIDT a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Mary Kimberly Schmidt

Voter Signature

Voter Name: MARY KIMBERLY SCHMIDT

Voter Name: Robert Towe

Voter Address: 6116 105th Ave N

Voter City, State, Zip Code: Pinellas Park FL 33782

Voter Email Address: Towe65.rt@gmail.com

Voter Cell Phone Number: 727-644-7714

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Robert Towe a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____ Date: 3-27-2024

Voter Signature
Voter Name: Robert Towe

Voter Name: Lynn Thompson

Voter Address: 1310 5TH Terrace NW

Voter City, State, Zip Code: Largo, FL 33770

Voter Email Address: linestylynn13@gmail.com

Voter Cell Phone Number: 502-230-9964

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Lynn Thompson a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Lynn Thompson

Voter Signature
Voter Name: Lynn Thompson

Voter Name: STEPHEN TREULICH

Voter Address: 4319 FALLBROOK BLVD

Voter City, State, Zip Code: PALM HARBOR FL 34685

Voter Email Address: STREULICH@GMAIL.COM

Voter Cell Phone Number: 631-729-5301

DATE: 6/20/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, STEPHEN TREULICH a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: STEPHEN TREULICH

Voter Name: SUSAN TUMBLESON

Voter Address: 2 COUNTRY CLUB DR

Voter City, State, Zip Code: LARGO FL 33771

Voter Email Address: SUETUM@GMAIL.COM

Voter Cell Phone Number: 940-231-5290

DATE: 3-1-24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Susan Tumbleson a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Susan Tumbleson

Voter Signature
Voter Name: SUSAN TUMBLESON

Voter Name: Constance Willis

Voter Address: 10380 127th PL

Voter City, State, Zip Code: Largo, FL 33773

Voter Email Address: Conniewillis2@msn.com

Voter Cell Phone Number: 727 455 4747

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Constance Willis a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X Constance J Willis

Voter Signature

Voter Name: Constance J Willis

Voter Name: HAROLD WILLIS

Voter Address: 10380 122TH PL

Voter City, State, Zip Code: LARGO, FL 33773

Voter Email Address: CONNIEWILLIS2@MSN.COM

Voter Cell Phone Number: 727-331-4726

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, HAROLD WILLIS a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x HAROLD WILLIS

Voter Signature
Voter Name: Harold Willis

Voter Name: Theresa Zeitz

Voter Address: 1826 9th Ave NW

Voter City, State, Zip Code: Largo FL 33770

Voter Email Address: _____

Voter Cell Phone Number: 727-412-1668

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Theresa Zeitz a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Theresa Zeitz

Voter Signature

Voter Name: Theresa Zeitz

Voter Name: Timothy Thomas

Voter Address: 334 Bayscene Point Blvd

TIM

Voter City, State, Zio Code: Saint Petersburg FL 33708

Voter Email Address: tim.thomas2911@gmail.com

Voter Cell Phone Number: 770 480 2911

DATE: 2/26/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Timothy Thomas, a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X Timothy Thomas

Voter Signature

Voter Name: Timothy Thomas

Voter Name: Allyson Talbert

Voter Address: 13679 Serena Dr.

Voter City, State, Zip Code: Largo FL 33774

Voter Email Address: allysontalbert93@gmail.com

Voter Cell Phone Number: 727-204-1894

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Allyson Talbert a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Allyson Talbert

Voter Signature

Voter Name: Allyson Talbert

2/19/24

DALE

Voter Name: DALE WILLIAMS

Voter Address: 1317 CANTERBURY RD N

Voter City, State, Zip Code: ST Petersburg, FL. 33710

Voter Email Address: DALEW0417@YAHOO.COM

Voter Cell Phone Number: 727 365 7734

DATE: 2/25/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, DALE WILLIAMS a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x DALE WILLIAMS

Voter Signature

Voter Name: Dale Williams

Vicki

Voter Name: Vicki Jean Williams

Voter Address: 1317 Canterbury Rd. N

Voter City, State, Zip Code: St. Petersburg, FL 33710

Voter Email Address: Vicki_Williams4922@yahoo.com

Voter Cell Phone Number: 727-466-7656

DATE: 2-25-2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Vicki J. Williams a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

i believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X Vicki Jean Williams

Voter Signature

Voter Name: Vicki Jean Williams

Voter Name: JEFF RYBAK (JEFFREY G. RYBAK)

Voter Address: 5257 5TH AVE N

Voter City, State, Zip Code: ST PETE FL 33710

Voter Email Address: JGRYBAK@HOTMAIL.COM

Voter Cell Phone Number: 813-445-0317

DATE: 3/13/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, JEFF RYBAK (JEFFREY G. RYBAK) a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Jeff Rybak (Jeffrey G. Rybak)

Voter Signature
Voter Name: JEFF RYBAK (JEFFREY G. RYBAK)

Voter Name: ROSLYN ROGERS

Voter Address: 19341 US HWY 19 N

Voter City, State, Zip Code: 33764

Voter Email Address: ROSLYN ROGERS@AOL.COM

Voter Cell Phone Number: 602-319-9362

DATE: 3/13/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, ROSLYN ROGERS a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Roslyn Rogers

Voter Signature

Voter Name: ROSLYN ROGERS

Voter Name: Tracy Rivera

Voter Address: 437 5th St NW

Voter City, State, Zip Code: Largo FL 33770

Voter Email Address: bratsy@yahoo.com

Voter Cell Phone Number: 727-558-5157

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE:

Dear Pinellas County Members of the Grand Jury,

I, Tracy Rivera a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Tracy Rivera

Voter Signature
Voter Name: Tracy Rivera

Voter Name: Paul Roe

Voter Address: 11751 106th Ct.

Voter City, State, Zip Code: Seminole, FL 33778

Voter Email Address: roe.paul@gmail.com

Voter Cell Phone Number: 407-309-0067

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Paul Roe a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____ Date: 3/27/24

Voter Signature
Voter Name: Paul Roe

Voter Name: Kenneth Raines

Voter Address: 12150 Park Blvd #186

Voter City, State, Zip Code: Seminole FL 33772

Voter Email Address: Kraines001@Gmail.com

Voter Cell Phone Number: 850 485 8608

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Kenneth Raines a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

_____ Date: 3/27/24

Voter Signature
Voter Name: Kenneth Raines

Voter Name: John Reego

Voter Address: 2701 34th St N, Lot 515

Voter City, State, Zip Code: St Pete, FL 33713

Voter Email Address: john.reego@gmail.com

Voter Cell Phone Number: 815 814 2084

DATE: 2/20/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, _____ a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: John Reego

Voter Name: Kristen Richie

Voter Address: 2785 Enterprise Rd E (Apt 18)

Voter City, State, Zip Code: Clearwater, FL 33759

Voter Email Address: Kristen.richie@icloud.com

Voter Cell Phone Number: 727-709-3692

DATE: 2/20/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Kristen Richie a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: Kristen Richie

Voter Name: Darlene Madden

Voter Address: 1882 Del Robles Dr.

Voter City, State, Zip Code: Clearwater, FL 33764

Voter Email Address: marisalexlair@aol.com

Voter Cell Phone Number: 7272180261

DATE: 2/27/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Darlene Madden a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Darlene Madden

Voter Signature

Voter Name: Darlene Madden

Voter Name : Stacy Myers

Voter Address: 331 Bahia Vista Dr.

Voter City, State, Zip Code: Indian Rocks Beach FL 33785

Voter Email Address: Smyerspi@gmail.com

Voter Cell Phone Number: 813 472 3747

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Stacy Myers a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: Stacy Myers

Voter Name: Marilee J. Myer

Voter Address: 337 Bahia Vista Dr

Voter City, State, Zip Code: IRB, Fl 33785

Voter Email Address: Marilee.Myers77@Gmail.com

Voter Cell Phone Number: 727-355-4260

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Marilee Myers a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X Marilee J. Myers

Voter Signature Marilee J. Myers

Voter Name: Marilee J Myers

Voter Name: Charlotte Mercier

Voter Address: 5520-68th Way N. Apt. 6104

Voter City, State, Zip Code: St Petersburg, Fla. 33709

Voter Email Address: stanchari@hotmail.com

Voter Cell Phone Number: 727-368-3168

DATE: 2/20/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members

Clerk of Court Address: _____

Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Charlotte Mercier, a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Charlotte Mercier

Voter Signature

Voter Name: Charlotte Mercier

Voter Name: Zenith Mulkerin

Voter Address: 2391 Nash St

Voter City, State, Zip Code: Clearwater, FL 33765

Voter Email Address: zmulkerin@gmail.com

Voter Cell Phone Number: 727-492-2219

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Zenith Mulkerin a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Zenith Mulkerin Date: 3-22-24

Voter Signature
Voter Name: Zenith Mulkerin

Voter Name: ELAINE M MOORE

Voter Address: 13014 BOCA CIEGA AV.

Voter City, State, Zip Code: MADEIRA BCH, FL 33738

Voter Email Address: 39zeeta@gmail.com

Voter Cell Phone Number: (727) 251-2098

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address:

Clerk of Court City, State, Zip Code:

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, ELAINE M. MOORE a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,
X
Date: 3-21-2024
Voter Signature
Voter Name: ELAINE M. MOORE

Voter Name: DIANE MITCHELL

Voter Address: 3 PINAO PALM ST. EAST

Voter City, State, Zip Code: LARGO, FL 33770

Voter Email Address: FORGSTANLEY@ATT.NET

Voter Cell Phone Number: 708-250-5467

DATE: 2/28/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, DIANE MITCHELL a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Diane Mitchell

Voter Signature
Voter Name: DIANE MITCHELL

Voter Name: Joyce Svabek

Voter Address: 7000 Ulmerton Road

Voter City, State, Zip Code: Largo, FL 33771

Voter Email Address: joycesvabek@verizon.net

Voter Cell Phone Number: 727-748-2442

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Joyce Svabek a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Joyce Svabek

Voter Signature

Voter Name: Joyce Svabek

Voter Name: LOUIS J. SVABEK

Voter Address: 1000 ULMERTON Rd.

Voter City, State, Zip Code: LARGO, FL 33771

Voter Email Address: lou26@live.com

Voter Cell Phone Number: 727 365 1473

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06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, LOUIS J. SVABEK a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Louis J. Svabek

Voter Signature
Voter Name: LOUIS J. SVABEK

Voter Name: Linda Swager

Voter Address: 14546 Oliver St.

Voter City, State, Zip Code: Largo, FL. 33774

Voter Email Address: LindaSwager16@gmail.com

Voter Cell Phone Number: 727 455-4204

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Linda Swager a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Linda L Swager Date: 3/27/24

Voter Signature
Voter Name: Linda Swager

Voter Name: William E Swager III

Voter Address: 14576 Oliver St

Voter City, State, Zip Code: Largo FL 33774

Voter Email Address: wme.swager@gmail.com

Voter Cell Phone Number: 727-743-2694

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, William E. Swager III a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X William E Swager III Date: 3-27-24

Voter Signature
Voter Name: William E Swager III

Voter Name: Linda Woods Signor

Voter Address: 6 BELLEMEADE Cir.

Voter City, State, ZipCode: LARGO FL 33770

Voter Email Address: LSignor32@gmail.com

Voter Cell Phone Number: 727-251-0942

06/16/2024

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Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Linda W. Signor a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Linda W. Signor

Voter Signature

Voter Name: Linda W. Signor

Voter Name: David Swinford

Voter Address: 615 Wildwood Way

Voter City, State, Zip Code: Clearwater, FL 33756

Voter Email Address: DaveSwinford@aol

Voter Cell Phone Number: 309-350-0338

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06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, David Swinford a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: David Swinford

Voter Name: Susan Smith

Voter Address: 2542 Countrybrook Dr #16

Voter City, State, Zip Code: Palm Harbor FL 34684

Voter Email Address: SLSUSANSmith@gmail.com

Voter Cell Phone Number: 727-459-6522

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Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: Palm Harbor FL

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Susan Smith a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Susan Smith Date: 3/28/24

Voter Signature
Voter Name: Susan Smith

Voter Name: MADONNA L. STEINLAGE

Voter Address: 400 18th AVE

Voter City, State, Zip Code: INDIAN ROCKS BEACH, FL 33785

Voter Email Address: Madonnac21@gmail.com

Voter Cell Phone Number: 727-420-7620

06/16/2024

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Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE:

Dear Pinellas County Members of the Grand Jury,

I, MADONNA L. STEINLAGE a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Madonna L Steinlage

Voter Signature

Voter Name: MADONNA L STEINLAGE

Voter Name: Frank Schuster

Voter Address: 1017 Bramblewood CT

Voter City, State, Zip Code: Safety Harbor FL 34695

Voter Email Address: movingsoon70@yahoo.com

Voter Cell Phone Number: _____

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE:

Dear Pinellas County Members of the Grand Jury,

I, Frank Schuster a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X F. Schust

Voter Signature
Voter Name: Frank Schuster

Voter Name: Rosalie M. Schollenberger

Voter Address: 11633 Sharon Drive

Voter City, State, Zip Code: Largo, FL 33774

Voter Email Address: rosiefl@tampabay.rr.com

Voter Cell Phone Number: (727) 637-8173

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Rosalie M. Schollenberger a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Rosalie M. Schollenberger

Voter Signature
Voter Name: Rosalie M. Schollenberger

Voter Name: Howard Segal

Voter Address: 2416 World Parkway Blvd #14

Voter City, State, Zip Code: Clearwater, FL. 33763

Voter Email Address: hm4hands@gmail.com

Voter Cell Phone Number: 727-439-0841

DATE: 2/23/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Howard Segal a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Howard Segal

Voter Signature

Voter Name: Howard Segal

Voter Name: DOROTHY L. CREAMER

Voter Address: 474 BOCA CIEGA PT. BLVD N

Voter City, State, Zip Code: ST. PETERSBURG, FL 33708

Voter Email Address: dcreamer@att.net

Voter Cell Phone Number: 239.565.6574

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, DOROTHY L CREAMER a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Dorothy L Creamer

Voter Signature

Voter Name: DOROTHY L. CREAMER

Voter Name: STEVEN COBERRE

Voter Address: 1416 HIGHFIELD Dr

Voter City, State, Zip Code: CLEARWATER, FL 33764

Voter Email Address: STEVECOBERRE@GMAIL.COM

Voter Cell Phone Number: 727-409-2196

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

RE:

Dear Pinellas County Members of the Grand Jury,

I STEVEN COBERRE a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X _____

Voter Signature
Voter Name: STEVEN H. COBERRE

C360-788-62-291-0
Lissy
2/16/24
Exp. 9/1/24

Voter Name: Catherine F. DeVito

Voter Address: 1936 Michigan Ave NE

Voter City, State, Zip Code: St. Petersburg FL 33703

Voter Email Address: cfdevito12@aol.com

Voter Cell Phone Number: 727 418 9352

DATE: 2/20/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Catherine F. DeVito a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Catherine F. DeVito

Voter Signature

Voter Name: Catherine F DeVito

Voter Name: DOMINICK DELUCCA

Voter Address: 2014 DOUGLAS AVE

Voter City, State, Zip Code: CLEARWATER, FL 33755

Voter Email Address: dondg3@gmail.com

Voter Cell Phone Number: [redacted]

DATE: 7-20-24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, DOMINICK DELUCCA a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature

Voter Name: DOMINICK DELUCCA

Voter Name: EUGENE R. DELUCIA

Voter Address: 632 RIVIERA BAY DR NE

Voter City, State, Zip Code: ST. PETERSBURG, FL

Voter Email Address: EDELUCIA3@ME.COM

Voter Cell Phone Number: 727-254-2007

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Eugene R DeLucia, qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____ Date: MAR 27, 2024

Voter Signature
Voter Name: EUGENE R DELUCIA

Voter Name: MARY BECKETT DOWNING

Voter Address: 11380 41st St E

Voter City, State, Zip Code: Treasure Island FL 33706

Voter Email Address: marydowning61@gmail.com

Voter Cell Phone Number: 404) 933 7344

DATE: 3/13/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, MARY BECKETT DOWNING a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Mary Beckett Downing

Voter Signature
Voter Name: MARY BECKETT DOWNING

Voter Name: John Dodsworth

Voter Address: 11587 86th Ave Seminole FL 33772

Voter City, State, Zip Code: Seminole FL 33772

Voter Email Address: johndodsworth2009@gmail.com

Voter Cell Phone Number: 727-418-8078

DATE: 2-20-24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, John Dodsworth a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

i believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature
Voter Name: John Dodsworth

Voter Name: Barbara A. Brash

Voter Address: 1365 Stratford Dr.

Voter City, State, Zip Code: Largo Clear, FL 33756

Voter Email Address: barbarabrash4@gmail.com

Voter Cell Phone Number: 727-742-4833

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Barbara A. Brash a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,
x Barbara A Brash

Voter Signature
Voter Name: Brash, Barbara A

Voter Name: DONALD L. BRASH

Voter Address: 1345 STRATFORD DR.

Voter City, State, Zip Code: LARGO FL. 33756

Voter Email Address: 6852DINK@GMAIL.COM

Voter Cell Phone Number: 727-742-5852

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Donald Lee Brash a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Donald Lee Brash

Voter Signature
Voter Name: Donald Lee Brash
DONALD LEE BRASH

Voter Name: Melody Brathwaite

Voter Address: 8187 Cottonwood Dr

Voter City, State, Zip Code: Largo, FL 33773

Voter Email Address: Hockylady1115@aol.com

Voter Cell Phone Number: 727-518-5980

DATE: 2/20/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Melody Brathwaite a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

i believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Melody Brathwaite

Voter Signature
Voter Name: Melody Brathwaite

Voter Name: Gordon Brathwaite

Voter Address: 8187 Cottonwood Dr

Voter City, State, Zip Code: Largo FL 33777

Voter Email Address: Flasbrth@aol.com

Voter Cell Phone Number: 7276566105

DATE: 2-20-24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Gordon Brathwaite a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: Gordon R Brathwaite

Voter Name: FRED BELZEL

Voter Address: 12809 MIA CIR

Voter City, State, Zip Code: LARGO, FL 33774

Voter Email Address: FBELZEL@GMAIL.COM

Voter Cell Phone Number: (727) 656 5291

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, FRED BELZEL a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: FREDERICK BELZEL

Voter Name: Judith C. AKin

Voter Address: 1001 Starkey Rd. #522

Voter City, State, Zip Code: Largo, FL 33771

Voter Email Address: Feight8345@aol.com

Voter Cell Phone Number: 727 647-7872

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Judy C. AKin a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Judy C AKin

Voter Signature

Voter Name: Judith C. AKin

Judy C AKin

Voter Name: Donald S Bithell

Voter Address: 11260 142nd St

Voter City, State, Zip Code: Largo FL 33774

Voter Email Address: DBENTINC@GMAIL.COM

Voter Cell Phone Number: (310) 463-4616

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE:

Dear Pinellas County Members of the Grand Jury,

I, Donald Bithell a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: Donald S Bithell

Voter Name: Esther Brooks

Voter Address: 12033 65th Lane North

Voter City, State, Zip Code: Largo 33773

Voter Email Address: estherbrooks@tampabay.rr

Voter Cell Phone Number: 727-458-7000

Pinellas County Grand Jury Members
Clerk of Court Address: 14250 49th ST N
Clerk of Court City, State, Zip Code: Clearwater, FL 33762

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, _____ a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL.

Thank you for your attention to this matter.

Sincerely,

X Esther Brooks Date: 4/23/24

Voter Signature
Voter Name: Esther Brooks

Voter Name: Marlene Bellomo

Voter Address: 13300 Indian Rocks Road 1302

Voter City, State, Zip Code: Largo Florida

Voter Email Address: Marlene_Bellomo@Yahoo.com

Voter Cell Phone Number: 586 215 6890

DATE: Feb 27 2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Marlene Bellomo a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X Marlene P Bellomo

Voter Signature
Voter Name: Marlene Bellomo

Voter Name: Patricia Bisson

Voter Address: 33773371 Hillside Ave apt #1

Voter City, State, Zip Code: Largo FL 33774

Voter Email Address: Patriciambisson@gmail.com

Voter Cell Phone Number: 603-370-1976

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

RE:

Dear Pinellas County Members of the Grand Jury,

I, PATRICIA Bisson a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X Patricia Bisson

Voter Signature
Voter Name: Patricia Bisson

B250693485960
A Lissy 2/16/24
Exp. 9/1/24

Voter Name: KATHERINE ANDERSON

Voter Address: 12296 104TH ST.N

Voter City, State, Zip Code: LARGO

Voter Email Address: KKANDI1845@GMAIL.COM

Voter Cell Phone Number: 727 303 1911

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE:

Dear Pinellas County Members of the Grand Jury,

I, KATHERINE ANDERSON a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: KATHERINE ANDERSON

Voter Name: Christa Belzel

Voter Address: 12809 Mia Circle

Voter City, State, Zip Code: Largo, FL 33774

Voter Email Address: mcbelzel@gmail.com

Voter Cell Phone Number: 727-656-5277

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Christa Belzel a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

x Christa Belzel

Voter Signature
Voter Name: Christa Belzel

Voter Name: Douglas Asellus

Voter Address: 10636 Seminole Forest St W.

Voter City, State, Zip Code: Seminole Florida, 33778

Voter Email Address: dsellus71@gmail.com

Voter Cell Phone Number: 248-981-1003

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Douglas Asellus a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature
Voter Name: Douglas Asellus

Voter Name: Elizabeth Aseltine

Voter Address: 10636 Semminole Forrest Stw

Voter City, State, Zip Code: Semminole FL

Voter Email Address: Bettsx3@Yahoo.com

Voter Cell Phone Number: 248-895-5612

DATE: 2-28-24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Elizabeth Aseltine a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x _____

Voter Signature
Voter Name: Elizabeth Aseltine

Voter Name: Monica Perembo

Voter Address: 11621 Gulf Blvd. #401

Voter City, State, Zip Code: Clearwater, FL 33767

Voter Email Address: monperembo@yahoo.com

Voter Cell Phone Number: 513-403-6987

DATE: 2/20/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Monica Perembo a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X Monica Perembo

Voter Signature
Voter Name: Monica Perembo

Voter Name: RODERICK PARAMORE

Voter Address: 177 DUGAN COURT

Voter City, State, Zip Code: PALM HARBOR FL 34684

Voter Email Address: robbieparamore@gmail.com

Voter Cell Phone Number: 508 261 8330

DATE: 2/20/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, ~~Roderick Paramore~~ a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: RODERICK PARAMORE

Voter Name: David W Perrego

Voter Address: 2175 Glen Dr

Voter City, State, Zip Code Safety Harbor

Voter Email Address: DWPVOICE@gmail.com

Voter Cell Phone Number: 813 795 5438

DATE 2/20/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, David W Perrego a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: _____

David W Perrego

Voter Name: Debbie Robinson

Voter Address: 10200-122 Ave #2553

Voter City, State, Zip Code: Largo, FL 33773

Voter Email Address: Webwoman52@gmail.com

Voter Cell Phone Number: 727-474-2944

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Debbie Robinson a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x Debbie Robinson

Voter Signature
Voter Name: Debbie Robinson

R152167529520
Amber Lissy 2/16/24
Exp. 9/1/24

Voter Name: Rodger Friedman

Voter Address: 1610 Hampton Court

Voter City, State, Zip Code: Safety Harbor FL 34695

Voter Email Address: RF179203@GMAIL.com

Voter Cell Phone Number: _____

DATE: 2/27/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Rodger Friedman a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: Rodger Friedman

Voter Name: Clifford A. Gephart

Voter Address: 1485 45th Ave NE

Voter City, State, Zip Code: St Pete FL 33703

Voter Email Address: Cliffgephart@gmail.com

Voter Cell Phone Number: 727-420-0789

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Clifford Gephart a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X _____

Voter Signature
Voter Name: Clifford Gephart

G163-101-70-254-0
Lissy 2/16/24
Exp 9/24

Jill

Voter Name: Jill Griffith

Voter Address: 334 Boca Ciega Point Blvd

Voter City, State, Zip Code: Saint Petersburg, FL 33708

Voter Email Address: jill.griffith2932@gmail.com

Voter Cell Phone Number: 770 480 2932

DATE: 2/26/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Jill Griffith a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE &
EXACT COPY OF ORIGINAL

Sincerely,

X Jill Griffith

Voter Signature

Voter Name: Jill Griffith

Voter Name: Lorraine Green

Voter Address: 1925 Flora Rd

Voter City, State, Zip Code: Clearwater 33755

Voter Email Address: Lasykori7@Gmail.com

Voter Cell Phone Number: _____

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code:_____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Lorraine Green a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X_____

Voter Signature
Voter Name: Lorraine Green

G650 52150 6850

A Lissy 2/16/24
Exp. 9/1/24

Voter Name: Yvette Gaugh

Voter Address: 9371 Blind Pass Rd

Voter City, State, Zip Code: St Pete Bch

Voter Email Address: commonsensetruthfreedom@gmail

Voter Cell Phone Number: 727 415 3170

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Yvette Gaugh a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X _____

Voter Signature
Voter Name: Yvette Gaugh

2/16/24
G200 9016 6517 0
Exp. 9/1/24

Voter Name: Adela Grace Gonzalez

Voter Address: 7100 Ulmerton Rd. Lot 552

Voter City, State, Zip Code: Largo, FL 33771

Voter Email Address: agracegonzalez@yahoo.com

Voter Cell Phone Number: 989-392-6013

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code:_____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, _____a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X Adela Grace Gonzalez Date: 2-27-2024

Voter Signature
Voter Name: Adela Grace Gonzalez

Voter Name: Marty GLaser

Voter Address: 9450 Harbor Greens Way

Voter City, State, Zip Code: Seminole, FL 33776

Voter Email Address: _____

Voter Cell Phone Number: _____

Pinellas County Grand Jury Members
Clerk of Court Address: 14250 49th St N
Clerk of Court City, State, Zip Code: Clearwater, FL 33762

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Martha GLaser a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL
CP

Thank you for your attention to this matter.

Sincerely,

X Martha E Glaser Date: 4/23/24

Voter Signature
Voter Name: Martha E. GLaser

Voter Name: Edward Glaser

Voter Address: 9450 Harbor Greens Way # 407

Voter City, State, Zip Code: Seminole FL 33776

Voter Email Address: eglaser6935@GMAIL.com

Voter Cell Phone Number: (727) 470-8005

Pinellas County Grand Jury Members
Clerk of Court Address: 14250 49th St N
Clerk of Court City, State, Zip Code: Clearwater, FL 33762

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Edward Glaser a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X Edward Glaser Date: 4-23-24

Voter Signature

Voter Name: Edward Glaser

Voter Name: Candace Gardner

Voter Address: 736 Delaware Way Apt 305

Voter City, State, Zip Code: Clearwater, FL 33767

Voter Email Address: CANDYfLaIe aOL.com

Voter Cell Phone Number: 727-296-8831

DATE: MAR. 1, 2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Candace Gardner a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Candace Gardner

Voter Signature
Voter Name: CANDACE GARDNER

Voter Name: Cailin Greene

Voter Address: 8771 Christie dr

Voter City, State, Zip Code: Largo, FL 33771

Voter Email Address: CailinGreene@hotmail.com

Voter Cell Phone Number: 727.479.4600

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code:_____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Cailin Greene ~~a~~ qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X _____ Date: 3/26/24

Voter Signature

Voter Name: Cailin Greene

Voter Name: Cynthia Giordano

Voter Address: 12514 138th St N

Voter City, State, Zip Code: Largo, FL 33774

Voter Email Address: havefaith88@tampabay.rr.com

Voter Cell Phone Number: 727-688-0205

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Cynthia Giordano a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Cynthia Giordano

Voter Signature

Voter Name: Cynthia Giordano

Voter Name: Emily Cantin

Voter Address: 6981 300th Ave. N.

Voter City, State, Zip Code: Clearwater, FL. 33761

Voter Email Address: _____

Voter Cell Phone Number: 727-734-1239

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Emily Cantin a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: Emily Cantin

Voter Name: Dylan Cantin

Voter Address: 6481 300th Ave. N

Voter City, State, Zip Code: Clearwater, FL, 33761

Voter Email Address: _____

Voter Cell Phone Number: _____

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Dylan Cantin a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: Dylan Cantin

Voter Name: Stephen Cantin

Voter Address: 6981 30th Ave. N.

Voter City, State, Zip Code: Clearwater, FL 33761

Voter Email Address: _____

Voter Cell Phone Number: 727-734-1239

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Stephen Cantin a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: Stephen Cantin

Voter Name: KIMBERLY A. CRAIL

Voter Address: 1052 58th AVE N

Voter City, State, Zip Code: ST PETERSBURG, FL 33703

Voter Email Address: KCRAIL@HOTMAIL.COM

Voter Cell Phone Number: 516.426.9459

DATE: 2/20/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, KIMBERLY A. CRAIL a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

Kimberly A. Crail

Voter Signature
Voter Name: KIMBERLY A. CRAIL

Voter Name: Janice L. Cox

Voter Address: 2840 La Concha Dr

Voter City, State, Zip Code: Clearwater FL 33762

Voter Email Address: Janch@tampabay.rr.com

Voter Cell Phone Number: 515-0163

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code:_____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, J.L. Cox a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X Janice L. Cox

Voter Signature
Voter Name: Janice L. Cox

Voter Name: CALVIN COOLIDGE

Voter Address: 250 ROSERY RD NW #276

Voter City, State, Zip Code: LARGO FL 33770

Voter Email Address: CCOOLIDGE@TAMPABAY.RR.COM

Voter Cell Phone Number: 865-397-8197

DATE: 2/27/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, CALVIN COOLIDGE a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: CALVIN COOLIDGE

Voter Name: Teresa Reed Conroy

Voter Address: 1011 Bay Ave. Unit B

Voter City, State, Zip Code: Clearwater Fl. 33756

Voter Email Address: TeresaConroy88@gmail.com

Voter Cell Phone Number: 407-460-9794 OR 727-332-9432

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code:_____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

RE:

Dear Pinellas County Members of the Grand Jury,

I, Teresa Reed Conroy a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: Teresa Reed Conroy

Voter Name: Tammy Calandrella

Voter Address: 7100 Ulmerton Rd #855

Voter City, State, Zip Code: Largo, FL. 33771

Voter Email Address: tam_ic71@yahoo

Voter Cell Phone Number: 603- 851- 1941

DATE: 3/10/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Tammy Calandrella qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Tammy Calandrella

Voter Signature

Voter Name: Tammy Calandrella

Voter Name: Anthony L. Curcio

Voter Address:
3186 Barbary Dr

Voter City, State, Zip Code: Tarpon Springs, Florida 34688

Voter Email Address:
alcurcio0070@yahoo.com

Voter Cell Phone Number:
908 642 0343

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address:

Clerk of Court City, State, Zip Code:

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Anthony L. Curcio a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,
X
Date: 3/21/2024
Voter Signature
Voter Name: Anthony L. Curcio

Voter Name: Anthony Calo

Voter Address: 1171 Iva ST.

Voter City, State, Zip Code: Clearwater Fla 33755

Voter Email Address: vinchenzia@aol.com

Voter Cell Phone Number: 727 743 8410

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Anthony Calo a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____ Date: 3/27/2024

Voter Signature

Voter Name: Anthony Calo

Voter Name: ~~ROBERT~~ ROBERT CARPENTER

Voter Address: 1801 EASTLAKE #12E

Voter City, State, Zip Code: PALM HARBOR FL 34685

Voter Email Address: GAMMON167@GMAIL.COM

Voter Cell Phone Number: 7274249019

DATE: 2/20/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, ROBERT CARPENTER a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: ROBERT CARPENTER

Voter Name: James Craig

Voter Address: 1834 golfview Dr.

Voter City, State, Zip Code: Tarpon Springs, FL 34689

Voter Email Address: JKcraig1151@gmail.com

Voter Cell Phone Number: 248-705-3183

DATE: 2/20/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, James Craig a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X James Craig

Voter Signature

Voter Name: James K. Craig

Voter Name: Kathleen (Kate) CRAIG

Voter Address: 1834 Golfview Dr.,

Voter City, State, Zip Code: Tarpon Springs, FL. 34689

Voter Email Address: chiKatie05@msn.com

Voter Cell Phone Number: 727-877-9415

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Kathleen Craig a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X KM Craig

Voter Signature
Voter Name: Kathleen CRAIG

Voter Name: John M. Creamer

Voter Address: 474 Boca Ciega Point Blvd. N.

Voter City, State, Zip Code: St. Petersburg,

Voter Email Address: JMCREAMER@att.net

Voter Cell Phone Number: 239 849 3043

DATE: 2/20/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, John M. Creamer a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X John M. Creamer

Voter Signature

Voter Name: John M. Creamer

Voter Name: Shauna Kattler

Voter Address: 100 - 1st Ave N, Unit 1003

Voter City, State, Zip Code: St. Petersburg, FL 33701

Voter Email Address: ShaunaKattler@gmail.com

Voter Cell Phone Number: 425-765-8519

DATE: March 13/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Shauna Kattler a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: Shauna Kattler

Voter Name: Lois Hartshorn

Voter Address: 7100 Overton #376

Voter City, State, Zip Code: Largo, FL 33771

Voter Email Address: Lois.Hartshorn@Icloud.com

Voter Cell Phone Number: 253 334 0491

DATE: 2/20/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Lois Hartshorn a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Lois Hartshorn

Voter Signature

Voter Name: Lois Hartshorn

Voter Name: Arleen S. Hadden

Voter Address: 1155 42nd Ave N

Voter City, State, Zip Code: St Pete, FL 33703

Voter Email Address: ASAND@tampabay.rr.com

Voter Cell Phone Number: 727-637-2373

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

RE:

Dear Pinellas County Members of the Grand Jury,

I, Arleen S Hadden a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X Arleen S Hadden

Voter Signature
Voter Name: Arleen S Hadden

H350017558260
Lissy 2/16/24
Exp. 9/1/24

Voter Name: Kenneth J. Hinnenkamp

Voter Address: 2361 Alexander Cir APT 210

Voter City, State, Zip Code: Clearwater, FL 33763

Voter Email Address: khinnenkamp@gmail.com

Voter Cell Phone Number: 952-913-3717

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GR AND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Kenneth Hinnenkamp, a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Lissy 2/16/2

H552510529

Exp. 9/1/24

Sincerely,

X Kenneth Hinnenkamp

Voter Signature

Voter Name: Kenneth J. Hinnenkamp

Voter Name: CHARLENE HOLM

Voter Address: 11841 67TH LN

Voter City, State, Zip Code: LARGO, FL. 33773

Voter Email Address: h991@MSN.COM

Voter Cell Phone Number: 847-804-7458

DATE: 2/20/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Charlene Holm a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Charlene Holm

Voter Signature
Voter Name: CHARLENE HOLM

Voter Name: VICTOR HAMZA

Voter Address: 12808 McKinley BLVD

Voter City, State, Zip Code: LARGO FL 33020?

Voter Email Address: vhamza@aol.com

Voter Cell Phone Number: 727-716-1166

DATE: 2-29-24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Vic Hamza a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Vic Hamza

Voter Signature
Voter Name: VICTOR HAMZA

Voter Name: THOMAS Byron Hill

Voter Address: 11911 66TH ST Lot 654

Voter City, State, Zip Code: LARGO, FL 33773

Voter Email Address: TBHILLSR@GMAIL.com

Voter Cell Phone Number: 806 353 5848

DATE: 3-18-24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL.

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Byron Hill a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Byron Hill

Voter Signature

Voter Name: Byron Hill

Voter Name: HOLLAND, DONALD MICHAEL

Voter Address: 2476 ENTERPRISE ROAD #5

Voter City, State, Zip Code: CLEARWATER, FL 33763

Voter Email Address: dholland23@brighthouse.com

Voter Cell Phone Number: 727-687-5314

DATE: 3/13/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, HOLLAND, DONALD MICHAEL a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Don Holland

Voter Signature
Voter Name: HOLLAND, DONALD MICHAEL

Voter Name: Frances Hill

Voter Address: 105 3rd St N

Voter City, State, Zip Code: Safety Harbor

Voter Email Address: frances.hill526@yahoo.com

Voter Cell Phone Number: 727.726.0859

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Frances Hill a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Frances Hill

Voter Signature

Voter Name: Frances Hill

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

H400254492860

Amber Lissy 2/16/24

Exp 9/24

Voter Name: MARK S HANEY

Voter Address: 3824 90TH TER

Voter City, State, Zip Code: PINELLAS PARK FL 33782

Voter Email Address: MARK.NEWS@MAC.COM

Voter Cell Phone Number: 727-204-8589

DATE: 2-20-24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code:_____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, MARK S HANEY a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF THE ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X_____
Voter Signature
Voter Name: MARK S HANEY

Voter Name: Paula L Hochman

Voter Address: 3001 Brigadoon Dr

Voter City, State, Zip Code: Clearwater FL 33759

Voter Email Address: paulahoch@

Voter Cell Phone Number: 727 492 0025

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Paula L Hochman a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Paula L Hochman

Voter Signature
Voter Name: Paula L Hochman

Voter Name: Scott Johnson

Voter Address: 1321 S. Betty Ln

Voter City, State, Zip Code: Clearwater, FL 33756

Voter Email Address: scautb2hauti@gmail.com

Voter Cell Phone Number: 727 396 6556

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Scott D. Johnson a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury In Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: Scott Johnson

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

J525-784-63-082-1
Amber Lissy 2/16/24
Exp 9/24

Voter Name: ELAINE JACKSON

Voter Address: 9335 121ST TERRACE

Voter City, State, Zip Code: LARGO, FL 33773

Voter Email Address: Cwdance1230yahoo.com

Voter Cell Phone Number: 727.459.1854

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, ELAINE JACKSON a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

i believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Elaine N. Jackson

Voter Signature

Voter Name: ELAINE N JACKSON

Voter Name: DEAN JARVIS

Voter Address: 4060 85ST N.

Voter City, State, Zip Code: ST. PETERSBURG FL 33709

Voter Email Address: DEANJARVIS@TAMPABAY.RR.COM

Voter Cell Phone Number: 727-458-6897

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE:

Dear Pinellas County Members of the Grand Jury,

I, DEAN JARVIS a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: DEAN JARVIS

Voter Name: Linda Jenguine

Voter Address: 835 Brady Wine Ldr.

Voter City,State, Zip Code: Largo, FL 33771

Voter Email Address: ljenguine@gmail.com

Voter Cell Phone Number: 727-480-2652

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

DATE: 2/24/2024

Pinellas County Grand Jury Members
Clerk of Court Address: 13001 Starkey Rd
Clerk of Court City, State, Zip Code: Largo, FL 33773-1416

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Linda Jenguine a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Linda Jenguine

Voter Signature
Voter Name: Linda Jenguine

Voter Name: Ellen Virginia Judge

Voter Address: 2501 Beach Blvd S. Apt 4

Voter City, State, Zip Code: Gulfport, FL 33707

Voter Email Address: ellenjudge1967@gmail.com

Voter Cell Phone Number: 727-422-3052

DATE: 3/13/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Ellen Virginia Judge a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Ellen Virginia Judge

Voter Signature

Voter Name: Ellen Virginia Judge

Voter Name: Christine Jennings

Voter Address: 15484 Bedford Cir. West

Voter City, State, Zip Code: Clearwater FL 33764

Voter Email Address: Strudem1950@gmail.com

Voter Cell Phone Number: 727-641-2703

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

Christine Jennings a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

x Christine Jennings

Voter Signature

Voter Name: Christine Jennings

J552 117505520
Amber Lissy 2/16/24
Exp. 9/1/24

Voter Name: CAROL OVERHART

Voter Address: 12419 Oakview Place

Voter City, State, Zip Code: Seminole FL

Voter Email Address: cloversunrise@aol.com

Voter Cell Phone Number: 727-804-2586

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Carol Overhart a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature
Voter Name: Carol L. Overhart

Voter Name: CARL EWING

Voter Address: 2165 LOUISA DR

Voter City, State, Zip Code: BELLEAIR BLF FL 33786

Voter Email Address: cajewing1@gmail.com

Voter Cell Phone Number: _____

DATE: 2/20/24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, CARL EWING a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

x Carl Ewing

Voter Signature
Voter Name: CARL EWING

Voter Name: Margaret Elmhurst Elmhurst

Voter Address: 2424 Kent Place

Voter City, State, Zip Code: Clearwater, Fl. 33764

Voter Email Address: pelmhurst@verizon.net

Voter ~~cell~~ home Phone Number: 727-531-7268

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Margaret Elmhurst a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Margaret A. Elmhurst

Voter Signature

Voter Name: Margaret A. Elmhurst

Voter Name: William Elmhurst

Voter Address: 2424 Kent Pl

Voter City, State, Zip Code: Clearwater, FL 33764

Voter Email Address: Belmhurst@verizon.net

Voter Cell Phone Number: 727 581 1268

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I William Elmhurst a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x William Elmhurst

Voter Signature
Voter Name: William Elmhurst

Voter Name: PAUL Foulks

Voter Address: 2960 64 Ave N.

Voter City, State, Zip Code: St Pete FL 33702

Voter Email Address: phennessy Foulks

Voter Cell Phone Number: 727-742-3604

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, PAUL H Foulks a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,
X Paul H Foulks Date: 3-27-24

Voter Signature
Voter Name: PAUL H. Foulks

Voter Name: Judy L Fureman

Voter Address: 7160 Ulmerton Rd #709

Voter City, State, Zip Code: Largo FL. 33771

Voter Email Address: JLFSwimmer@hotmail

Voter Cell Phone Number: 727-641-8935

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Judy Fureman a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____ Date: 2/27/25

Voter Signature

Voter Name: Judy L. Fureman

Voter Name: Thomas J. Firment

Voter Address: 13463 Cordova Dr.

Voter City, State, Zip Code: Largo, FL 33774

Voter Email Address: yfirment@aol.com

Voter Cell Phone Number: ———

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Thomas J. Firment a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

x Thomas J. Firment

VoterSignature
Voter Name: Thomas J. Firment

Voter Name: Yolanda Firment

Voter Address: 13463 Cordova Dr.

Voter City, State, Zip Code: Largo, FL 33774

Voter Email Address: yfirment@aol.com

Voter Cell Phone Number: 727-294-5971

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Yolanda Firment a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Yolanda Firment

Voter Signature
Voter Name: Yolanda Firment

Voter Name: MAGGIE HENSLER

Voter Address: 114 ORIOLE Rd

Voter City, State, Zip Code: CLEARWATER 33764

Voter Email Address: _____

Voter Cell Phone Number: _____

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Maggie Hensler a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x MAGGIE HENSLER

Voter Signature
Voter Name: Maggie Hensler

Voter Name: Colleen Eckhart

Voter Address: 315 Court St.

Voter City, State, Zip Code: Clearwater

Voter Email Address: _____

Voter Cell Phone Number: _____

DATE: 2-20-24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Colleen Eckhart a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: Colleen Eckhart

Voter Name: JOHN L. CARROLL

Voter Address: 571 GINGERLEAF DR.

Voter City, State, Zip Code: LARGO, FL. 33770

Voter Email Address: _____

Voter Cell Phone Number: _____

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, JOHN L. CARROLL a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature
Voter Name: JOHN L. CARROLL

Voter Name: KEVIN HARRIS

Voter Address: 2114 PINECREST DR

Voter City, State, Zip Code: _____

Voter Email Address: HEATHERHEADSIE@YAHOO.COM

Voter Cell Phone Number: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: 33760

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, KEVIN HARRIS a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____ Date: 3-27-24

Voter Signature
Voter Name: KEVIN HARRIS

Voter Name: Florence A. Anderson

Voter Address: 1361 Del Prado Drive S

Voter City, State, Zip Code: Largo, FL 33774-5407

Voter Email Address: —0—

Voter Cell Phone Number: —0—

06/16/2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL.

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Florence A. Anderson a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Florence A. Anderson

Voter Signature
Voter Name: Florence A. Anderson

Voter Name: Frank Schuster

Voter Address: 1017 Bramblewood CT

Voter City, State, Zip Code: Safety Harbor, FL 34695

Voter Email Address: _____

Voter Cell Phone Number: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Frank Schuster a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____ Date: 3/27/24

Voter Signature
Voter Name: Frank Schuster

Voter Name: Shawn Antonucci

Voter Address: 5225 97 way N

Voter City, State, Zip Code: St Pete FL 33708

Voter Email Address: _____

Voter Cell Phone Number: _____

DATE: 28 Feb 2024

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Shawn Antonucci a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature
Voter Name: Shawn Antonucci

VoterName: Katherine Klant

Voter Address: 14300-66th St N.

Voter City, State, Zip Code: Clearwater, FL 33764

Voter Email Address: abbygirl4016@yahoo.com

Voter Cell Phone Number: (727) 557-6621

DATE: 2-21-24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Katherine Klant a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X Katherine M. Klant

Voter Signature
Voter Name: Katherine Klant

Voter Name: RICHARD ICUH

Voter Address: 15055 HARDING AVE

Voter City, State, Zip Code: CLEARWATER FL 33760

Voter Email Address: RICUH@tampabay.rr.com

Voter Cell Phone Number: 727 686 6185

DATE: 02 24 24

X Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, RICHARD ICUH a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

x Richard Icuh

Voter Signature
Voter Name: RICHARD ICUH

Voter Name: DONALD KINNEY

Voter Address: 6144 46TH AVE N

Voter City, State, Zip Code: KENNETH CITY FL

Voter Email Address: DONINES@HOTMAIL.COM

Voter Cell Phone Number: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, DONALD KINNEY a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I a m willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X Donald Kinney

Voter Signature
Voter Name: DONALD KINNEY

K500196511310

Lissy 2/16/24
Exp. 9/1/24

Voter Name: Blanca Kinney

Voter Address: 6144 46th Ave N

Voter City, State, Zip Code: Kenneth City FL

Voter Email Address: Dbrunes@Hotmail.com

Voter Cell Phone Number: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I Blanca Kinney a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X Blanca Kinney

Voter Signature

Voter Name: Blanca Kinney

K500-069-42-872-0
Lissy 2/16/24
Exp. 9/1/24

Voter Name: Jeffery B Hobs

Voter Address: 3824 90th Ter N

Voter City, State, Zip Code: Pinellas Park FL 33782

Voter Email Address: IdeaSolutions@aol.com

Voter Cell Phone Number: 612.408.6500

06/16/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

RE:

Dear Pinellas County Members of the Grand Jury,

I, Jeffery B. Hobs a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Notary Public State of Florida
Amber Lissy
My Commission HH 038737
Expires 09/01/2024

Sincerely,

X _____

Voter Signature

Voter Name: Jeffery B Hobs

2/16/24

Exp. 9/1/24

Voter Name: Christopher J Knoll

Voter Address: 971 Park St

Voter City, State, Zip Code: Clearwater FL 33755

Voter Email Address: ChrisJknoll@verizon.net

Voter Cell Phone Number: 201-618-4006

DATE: 2/20/2024

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Christopher J Knoll a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X Chris Knoll

Voter Signature
Voter Name: Christopher J Knoll

Voter Name: Leo Kazarian

Voter Address: 6425 Shoreline Dr Apt 1040 1

Voter City, State, Zip Code: Saint Petersburg FL 33708

Voter Email Address: mrleo71@aol.com

Voter Cell Phone Number: 617-803-1129

DATE: 3-6-2024

Pinellas County Grand Jury Members
Clerk of Court Address: 14250 49th St N
Clerk of Court City, State, Zip Code: Clearwater, FL 33762

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Leo Kazarian a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

i believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL
CP

Sincerely,

X Leo Kazarian

Voter Signature
Voter Name: LEO M. KAZARIAN

Voter Name: Debra KAZARIAN

Voter Address: 6725 Shoreline Drive Unit 10401

Voter City, State, Zip Code: St. Petersburg FL 33708

Voter Email Address: DebbieAnnK@aol.com

Voter Cell Phone Number: 617-803-6399

DATE: 3-6-2024

Pinellas County Grand Jury Members
Clerk of Court Address: 14250 49th St N
Clerk of Court City, State, Zip Code: Clearwater, FL 33762

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Debra KAZARIAN a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

i believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

x Debra Kazarian

Voter Signature
Voter Name: Debra Ann KAZARIAN

Voter Name: Robert Kelzer

Voter Address: 390 53rd Ave N. #271

Voter City, State, Zip Code: St Petersburg FL 33703

Voter Email Address: R.Kelzer@yahoo.com

Voter Cell Phone Number: 727.486.8425

Pinellas County Grand Jury Members
Clerk of Court Address: 14250 49th St N
Clerk of Court City, State, Zip Code: Clearwater, FL 33762

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, _____ a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Thank you for your attention to this matter.

Sincerely,

X _____ Date: 4-23-24

Voter Signature

Voter Name: Robert A Kelzer

Voter Name: Virginia Kempisty

Voter Address: 2007 83rd Ave. N #5132

Voter City, State, Zip Code: St. Pete FL 33702

Voter Email Address: buffgini@yahoo.com

Voter Cell Phone Number: 716-225-6111

DATE: 2-20-24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, Virginia Kempisty a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X Virginia Kempisty

Voter Signature

Voter Name: Virginia Kempisty

Voter Name: GENETTE L KOVA

Voter Address: 1000 ROSERY RD NW

Voter City, State, Zip Code: LARGO FL 33770

Voter Email Address: kgenne@gmail.com

Voter Cell Phone Number: 813 506-2620

DATE: 2-20-24

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, GENETTE KOVA a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Sincerely,

X _____

Voter Signature

Voter Name: GENETTE L KOVA

Voter Name: DEAN KATTLER

Voter Address: 100 1ST AVE N., UNIT 1003

Voter City. State, Zip Code: ST. PETERSBURG, FL, 33701

Voter Email Address: DKATTLER16@GMAIL.COM

Voter Cell Phone Number: (206) 402-8505

DATE: MAR 13/24

CERTIFIED TO BE A TRUE & EXACT COPY OF ORIGINAL

Pinellas County Grand Jury Members
Clerk of Court Address: _____
Clerk of Court City, State, Zip Code: _____

RE: PINELLAS COUNTY GRAND JURY INVESTIGATION INTO ELECTION CRIMES AND OTHER FELONIES

Dear Pinellas County Members of the Grand Jury,

I, DEAN KATTLER a qualified voter registered in Pinellas County, Florida, hereby request a grand jury investigation pursuant to the Florida Constitution and Florida Statute 104.43. I am concerned about potential violations of the provisions of the Florida Statutes in relation to Julie Marcus, Dustin Chase and 99 other John Doe and Jane Doe co-conspirators' election crimes, interference with voters casting their ballots and having their votes accurately counted in both local, state and federal elections, bribery, altering of election documents, concealment of election documents, subversive activities and conspiracy. Pinellas County voters concerns about these crimes have not been addressed by the Pinellas County State Attorney Bruce Bartlett or Sherrif Bob Gualtieri.

I believe that these alleged violations warrant the attention of the grand jury in Pinellas County, and I request that they convene a special investigation during the campaign preceding the upcoming election to determine whether sufficient grounds exist for indictments.

Please consider this letter as a formal request for a grand jury investigation in accordance with the Florida Constitution and Florida Statute 104.43. I am willing to provide any additional information or assistance that may be necessary for the investigation.

Thank you for your attention to this matter.

Sincerely,

X _____

Voter Signature

Voter Name: DEAN KATTLER

Tab M – QUALIFIED ELECTOR AFFIDAVITS – ILLEGALLY REQUESTED VBM BALLOTS

Tab N – COURTROOM WITNESS AFFIDAVITS – JUDGE PATRICIA MUSCARELLA BIAS

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Lisa Repetto, who, after being duly sworn, deposes and states as follows:

My name is Lisa Repetto, and I reside at 4962 Kylemore Ct Palm Harbor, FL 34685. I am over the age of eighteen, and I am competent to make this affidavit. The statements made herein are based on my personal knowledge.

On October 1, 2024, at 12:00pm in Courtroom D, I attended a hearing in the case of Christopher Gleason v. Julie Marcus, Case No. 24-003717-CI and Case No. 24-003995-CI, presided over by Judge Patricia Muscarella at the Pinellas County Courthouse, located at 315 Court St. Clearwater, Florida, 33756. Christopher Gleason, acting as a pro se plaintiff, was present and participated in the proceedings.

At a previous hearing, Judge Muscarella issued explicit instructions prohibiting anyone in the courtroom from recording the proceedings via any technological means, including but not limited to audio or video recordings. This prohibition extended to all parties, witnesses, and observers in the courtroom.

Requirement to Shut Off Phones

At this hearing we were instructed by multiple law enforcement officers in the courtroom who directed all individuals present to not only silence their phones but to completely shut them off during the proceedings. This requirement was troubling to myself and other attendees, as it prevented us from using our phones to document important details during the hearing.

No Court Reporter Present

Despite the importance of the hearing and the prohibition on public recordings, there was no court reporter present to transcribe the proceedings. Furthermore, no official digital recording system appeared to be in operation during the hearing.

Judge Muscarella's Concerning Response Regarding the Law

During the hearing, Plaintiff Christopher Gleason, a pro se litigant, asked Judge Muscarella if he could serve her with his complaint for recusal and disqualification under Florida Rule of General Practice and

Judicial Administration 2.330, which governs judicial disqualification. Judge Muscarella responded by stating that she "did not know the law on that." This response is highly concerning as it indicates a potential lack of knowledge of the legal procedures that directly pertain to the judge's ability to preside fairly and impartially over the case.

a. Legal Knowledge: Judges are required by the Florida Code of Judicial Conduct, specifically Canon 3, to be familiar with and apply the law appropriately in all cases. A judge's admission of not knowing the law regarding a fundamental issue like judicial disqualification raises serious questions about their competence and ability to ensure a fair trial.

Legal Basis for Complaint

a. Failure to Provide an Official Record

Under Florida Rule of General Practice and Judicial Administration 2.535, an official court reporter or electronic recording system should be available to maintain the official record of proceedings, particularly in significant hearings. In this case, no official record was created, violating the requirement for maintaining a record of court proceedings.

b. Prohibition on Recording by the Public

While Florida Rule 2.450 allows a judge to restrict public recordings under specific circumstances, such as to ensure the fairness of proceedings, the prohibition of all forms of recording in the absence of an official court reporter conflicts with principles of transparency. According to Article I, Section 24(a) of the Florida Constitution, the public has the right to access public records, including judicial records, unless specific statutory exceptions apply.

c. Use of Electronic Devices

The law enforcement officers' instructions to shut off phones rather than merely silence them conflicts with Florida Rule of General Practice and Judicial Administration 2.451, which only requires devices to be silenced unless they are causing disruption in the courtroom. Requiring complete phone shutdown exceeds the permissible limits outlined in the rule.

Concern About Judicial Competency

Judge Muscarella's statement that she did not know the law regarding service of a recusal motion is particularly alarming. Florida Rule of General Practice and Judicial Administration 2.330 provides clear guidance on disqualification of judges, including the procedure for serving motions. Judges are required

to possess a thorough knowledge of this rule, especially in cases involving allegations of bias or impartiality.

Harm and Potential Prejudice

The prohibition on recording and the absence of any official record of the hearing create significant concerns regarding transparency and potential prejudice. Furthermore, Judge Muscarella's apparent lack of familiarity with the law on recusal raises serious doubts about whether Christopher Gleason, as a pro se plaintiff, will receive a fair and impartial hearing. The judge's failure to correctly apply or even know the relevant legal standards undermines the integrity of the judicial process and could lead to future procedural or substantive errors.

Request for Review and Remedy

Based on the facts outlined above, I respectfully submit this affidavit to lodge a formal complaint against Judge Patricia Muscarella, requesting a review of the judge's conduct and decisions during the hearing on October 1, 2024. I believe that the judge's actions regarding the prohibition of recordings, the failure to ensure the creation of an official record, and her concerning statement about not knowing the law on recusal warrant further investigation for potential violations of the Florida Code of Judicial Conduct, particularly in ensuring transparency, fairness, and the administration of justice.

Statement of Good Faith:

I hereby certify that this affidavit and the statements contained herein are made in good faith and are not for the purpose of harassment, delay, or any improper objective. I believe the issues raised are genuine and substantial and require appropriate investigation and resolution.

Further affiant sayeth naught.

Dated this 4th of October, 2024. Lisa Repetto

Signature of Affiant

SWORN TO AND SUBSCRIBED before me this 4th day of October, 2024, by Lisa Repetto, who is personally known to me or has produced identification in the form of _____.

Christine Peters

Notary Public, State of Florida

My Commission Expires: 2-26-28

NOTARY PUBLIC STATE OF FLORIDA

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Debra Lewis, who, after being duly sworn, deposes and states as follows:

My name is Debra Lewis, and I reside at 1448 Seagull Dr # 202 Palm Harbor FL 34685 I am over the age of eighteen, and I am competent to make this affidavit. The statements made herein are based on my personal knowledge.

On October 1, 2024, at 12:00pm in Courtroom D, I attended a hearing in the case of Christopher Gleason v. Julie Marcus, Case No. 24-003717-CI and Case No. 24-003995-CI, presided over by Judge Patricia Muscarella at the Pinellas County Courthouse, located at 315 Court St. Clearwater, Florida, 33756. Christopher Gleason, acting as a pro se plaintiff, was present and participated in the proceedings.

At a previous hearing, Judge Muscarella issued explicit instructions prohibiting anyone in the courtroom from recording the proceedings via any technological means, including but not limited to audio or video recordings. This prohibition extended to all parties, witnesses, and observers in the courtroom.

Requirement to Shut Off Phones

At this hearing we were instructed by multiple law enforcement officers in the courtroom who directed all individuals present to not only silence their phones but to completely shut them off during the proceedings. This requirement was troubling to myself and other attendees, as it prevented us from using our phones to document important details during the hearing.

No Court Reporter Present

Despite the importance of the hearing and the prohibition on public recordings, there was no court reporter present to transcribe the proceedings. Furthermore, no official digital recording system appeared to be in operation during the hearing.

Judge Muscarella's Concerning Response Regarding the Law

During the hearing, Plaintiff Christopher Gleason, a pro se litigant, asked Judge Muscarella if he could serve her with his complaint for recusal and disqualification under Florida Rule of General Practice and

Judicial Administration 2.330, which governs judicial disqualification. Judge Muscarella responded by stating that she "did not know the law on that." This response is highly concerning as it indicates a potential lack of knowledge of the legal procedures that directly pertain to the judge's ability to preside fairly and impartially over the case.

a. Legal Knowledge: Judges are required by the Florida Code of Judicial Conduct, specifically Canon 3, to be familiar with and apply the law appropriately in all cases. A judge's admission of not knowing the law regarding a fundamental issue like judicial disqualification raises serious questions about their competence and ability to ensure a fair trial.

Legal Basis for Complaint

a. Failure to Provide an Official Record

Under Florida Rule of General Practice and Judicial Administration 2.535, an official court reporter or electronic recording system should be available to maintain the official record of proceedings, particularly in significant hearings. In this case, no official record was created, violating the requirement for maintaining a record of court proceedings.

b. Prohibition on Recording by the Public

While Florida Rule 2.450 allows a judge to restrict public recordings under specific circumstances, such as to ensure the fairness of proceedings, the prohibition of all forms of recording in the absence of an official court reporter conflicts with principles of transparency. According to Article I, Section 24(a) of the Florida Constitution, the public has the right to access public records, including judicial records, unless specific statutory exceptions apply.

c. Use of Electronic Devices

The law enforcement officers' instructions to shut off phones rather than merely silence them conflicts with Florida Rule of General Practice and Judicial Administration 2.451, which only requires devices to be silenced unless they are causing disruption in the courtroom. Requiring complete phone shutdown exceeds the permissible limits outlined in the rule.

Concern About Judicial Competency

Judge Muscarella's statement that she did not know the law regarding service of a recusal motion is particularly alarming. Florida Rule of General Practice and Judicial Administration 2.330 provides clear guidance on disqualification of judges, including the procedure for serving motions. Judges are required

to possess a thorough knowledge of this rule, especially in cases involving allegations of bias or impartiality.

Harm and Potential Prejudice

The prohibition on recording and the absence of any official record of the hearing create significant concerns regarding transparency and potential prejudice. Furthermore, Judge Muscarella's apparent lack of familiarity with the law on recusal raises serious doubts about whether Christopher Gleason, as a pro se plaintiff, will receive a fair and impartial hearing. The judge's failure to correctly apply or even know the relevant legal standards undermines the integrity of the judicial process and could lead to future procedural or substantive errors.

Request for Review and Remedy

Based on the facts outlined above, I respectfully submit this affidavit to lodge a formal complaint against Judge Patricia Muscarella, requesting a review of the judge's conduct and decisions during the hearing on October 1, 2024. I believe that the judge's actions regarding the prohibition of recordings, the failure to ensure the creation of an official record, and her concerning statement about not knowing the law on recusal warrant further investigation for potential violations of the Florida Code of Judicial Conduct, particularly in ensuring transparency, fairness, and the administration of justice.

Statement of Good Faith:

I hereby certify that this affidavit and the statements contained herein are made in good faith and are not for the purpose of harassment, delay, or any improper objective. I believe the issues raised are genuine and substantial and require appropriate investigation and resolution.

Further affiant sayeth naught.

Dated this 4th of October, 2024. Debra Lewis

Signature of Affiant

SWORN TO AND SUBSCRIBED before me this 4th day of October, 2024, by Debra Lewis, who is personally known to me or has produced identification in the form of _____.

Christine Peters

Notary Public, State of Florida

My Commission Expires: 2-26-28

NOTARY PUBLIC STATE OF FLORIDA

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Krista Kosier, who, after being duly sworn, deposes and states as follows:

My name is Krista Kosier, and I reside at 13302 Whispering Palms Pl SW Largo FL 33774. I am over the age of eighteen, and I am competent to make this affidavit. The statements made herein are based on my personal knowledge.

On October 1, 2024, at 12:00pm in Courtroom D, I attended a hearing in the case of Christopher Gleason v. Julie Marcus, Case No. 24-003717-CI and Case No. 24-003995-CI, presided over by Judge Patricia Muscarella at the Pinellas County Courthouse, located at 315 Court St. Clearwater, Florida, 33756. Christopher Gleason, acting as a pro se plaintiff, was present and participated in the proceedings.

At a previous hearing, Judge Muscarella issued explicit instructions prohibiting anyone in the courtroom from recording the proceedings via any technological means, including but not limited to audio or video recordings. This prohibition extended to all parties, witnesses, and observers in the courtroom.

Requirement to Shut Off Phones

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No Court Reporter Present

Despite the importance of the hearing and the prohibition on public recordings, there was no court reporter present to transcribe the proceedings. Furthermore, no official digital recording system appeared to be in operation during the hearing.

Judge Muscarella's Concerning Response Regarding the Law

During the hearing, Plaintiff Christopher Gleason, a pro se litigant, asked Judge Muscarella if he could serve her with his complaint for recusal and disqualification under Florida Rule of General Practice and

Judicial Administration 2.330, which governs judicial disqualification. Judge Muscarella responded by stating that she "did not know the law on that." This response is highly concerning as it indicates a potential lack of knowledge of the legal procedures that directly pertain to the judge's ability to preside fairly and impartially over the case.

a. Legal Knowledge: Judges are required by the Florida Code of Judicial Conduct, specifically Canon 3, to be familiar with and apply the law appropriately in all cases. A judge's admission of not knowing the law regarding a fundamental issue like judicial disqualification raises serious questions about their competence and ability to ensure a fair trial.

Legal Basis for Complaint

a. Failure to Provide an Official Record

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b. Prohibition on Recording by the Public

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c. Use of Electronic Devices

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Concern About Judicial Competency

Judge Muscarella's statement that she did not know the law regarding service of a recusal motion is particularly alarming. Florida Rule of General Practice and Judicial Administration 2.330 provides clear guidance on disqualification of judges, including the procedure for serving motions. Judges are required

to possess a thorough knowledge of this rule, especially in cases involving allegations of bias or impartiality.

Harm and Potential Prejudice

The prohibition on recording and the absence of any official record of the hearing create significant concerns regarding transparency and potential prejudice. Furthermore, Judge Muscarella's apparent lack of familiarity with the law on recusal raises serious doubts about whether Christopher Gleason, as a pro se plaintiff, will receive a fair and impartial hearing. The judge's failure to correctly apply or even know the relevant legal standards undermines the integrity of the judicial process and could lead to future procedural or substantive errors.

Request for Review and Remedy

Based on the facts outlined above, I respectfully submit this affidavit to lodge a formal complaint against Judge Patricia Muscarella, requesting a review of the judge's conduct and decisions during the hearing on October 1, 2024. I believe that the judge's actions regarding the prohibition of recordings, the failure to ensure the creation of an official record, and her concerning statement about not knowing the law on recusal warrant further investigation for potential violations of the Florida Code of Judicial Conduct, particularly in ensuring transparency, fairness, and the administration of justice.

Statement of Good Faith:

I hereby certify that this affidavit and the statements contained herein are made in good faith and are not for the purpose of harassment, delay, or any improper objective. I believe the issues raised are genuine and substantial and require appropriate investigation and resolution.

Further affiant sayeth naught.

Dated this 4 of October, 2024. Krista Kosper

Signature of Affiant

SWORN TO AND SUBSCRIBED before me this 4th day of October, 2024, by Krista Kosper, who is personally known to me or has produced identification in the form of _____.

Christine Peters

Notary Public, State of Florida

My Commission Expires: 2-26-28

NOTARY PUBLIC STATE OF FLORIDA

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Keith L. Eshelman, who, after being duly sworn, deposes and states as follows:

My name is Keith L. Eshelman and I reside at 2430 Brazilia Dr. #4, Clearwater FL 33763. I am over the age of eighteen, and I am competent to make this affidavit. The statements made herein are based on my personal knowledge.

On October 1, 2024, at 12:00pm in Courtroom D, I attended a hearing in the case of Christopher Gleason v. Julie Marcus, Case No. 24-003717-CI and Case No. 24-003995-CI, presided over by Judge Patricia Muscarella at the Pinellas County Courthouse, located at 315 Court St. Clearwater, Florida, 33756. Christopher Gleason, acting as a pro se plaintiff, was present and participated in the proceedings.

At a previous hearing, Judge Muscarella issued explicit instructions prohibiting anyone in the courtroom from recording the proceedings via any technological means, including but not limited to audio or video recordings. This prohibition extended to all parties, witnesses, and observers in the courtroom.

Requirement to Shut Off Phones

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No Court Reporter Present

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Judge Muscarella's Concerning Response Regarding the Law

During the hearing, Plaintiff Christopher Gleason, a pro se litigant, asked Judge Muscarella if he could serve her with his complaint for recusal and disqualification under Florida Rule of General Practice and

Judicial Administration 2.330, which governs judicial disqualification. Judge Muscarella responded by stating that she "did not know the law on that." This response is highly concerning as it indicates a potential lack of knowledge of the legal procedures that directly pertain to the judge's ability to preside fairly and impartially over the case.

a. Legal Knowledge: Judges are required by the Florida Code of Judicial Conduct, specifically Canon 3, to be familiar with and apply the law appropriately in all cases. A judge's admission of not knowing the law regarding a fundamental issue like judicial disqualification raises serious questions about their competence and ability to ensure a fair trial.

Legal Basis for Complaint

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Request for Review and Remedy

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Statement of Good Faith:

I hereby certify that this affidavit and the statements contained herein are made in good faith and are not for the purpose of harassment, delay, or any improper objective. I believe the issues raised are genuine and substantial and require appropriate investigation and resolution.

Further affiant sayeth naught.

Dated this 3rd of October, 2024. Keith L. Eshelman

Signature of Affiant

SWORN TO AND SUBSCRIBED before me this 3rd day of October, 2024, by Keith L. Eshelman, who is personally known to me or has produced identification in the form of _____.

Christine Peters

Notary Public, State of Florida

My Commission Expires: 2-26-28

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Maureen Zilles, who, after being duly sworn, deposes and states as follows:

My name is MAUREEN ZILLES, and I reside at 8392 Meadowbrook Dr E, Largo, Fl. 33777 I am over the age of eighteen, and I am competent to make this affidavit. The statements made herein are based on my personal knowledge.

On October 1, 2024, at 12:00pm in Courtroom D, I attended a hearing in the case of Christopher Gleason v. Julie Marcus, Case No. 24-003717-CI and Case No. 24-003995-CI, presided over by Judge Patricia Muscarella at the Pinellas County Courthouse, located at 315 Court St. Clearwater, Florida, 33756. Christopher Gleason, acting as a pro se plaintiff, was present and participated in the proceedings.

At a previous hearing, Judge Muscarella issued explicit instructions prohibiting anyone in the courtroom from recording the proceedings via any technological means, including but not limited to audio or video recordings. This prohibition extended to all parties, witnesses, and observers in the courtroom.

Requirement to Shut Off Phones

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During the hearing, Plaintiff Christopher Gleason, a pro se litigant, asked Judge Muscarella if he could serve her with his complaint for recusal and disqualification under Florida Rule of General Practice and

Judicial Administration 2.330, which governs judicial disqualification. Judge Muscarella responded by stating that she "did not know the law on that." This response is highly concerning as it indicates a potential lack of knowledge of the legal procedures that directly pertain to the judge's ability to preside fairly and impartially over the case.

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b. Prohibition on Recording by the Public

While Florida Rule 2.450 allows a judge to restrict public recordings under specific circumstances, such as to ensure the fairness of proceedings, the prohibition of all forms of recording in the absence of an official court reporter conflicts with principles of transparency. According to Article I, Section 24(a) of the Florida Constitution, the public has the right to access public records, including judicial records, unless specific statutory exceptions apply.

c. Use of Electronic Devices

The law enforcement officers' instructions to shut off phones rather than merely silence them conflicts with Florida Rule of General Practice and Judicial Administration 2.451, which only requires devices to be silenced unless they are causing disruption in the courtroom. Requiring complete phone shutdown exceeds the permissible limits outlined in the rule.

Concern About Judicial Competency

Judge Muscarella's statement that she did not know the law regarding service of a recusal motion is particularly alarming. Florida Rule of General Practice and Judicial Administration 2.330 provides clear guidance on disqualification of judges, including the procedure for serving motions. Judges are required

to possess a thorough knowledge of this rule, especially in cases involving allegations of bias or impartiality.

Harm and Potential Prejudice

The prohibition on recording and the absence of any official record of the hearing create significant concerns regarding transparency and potential prejudice. Furthermore, Judge Muscarella's apparent lack of familiarity with the law on recusal raises serious doubts about whether Christopher Gleason, as a pro se plaintiff, will receive a fair and impartial hearing. The judge's failure to correctly apply or even know the relevant legal standards undermines the integrity of the judicial process and could lead to future procedural or substantive errors.

Request for Review and Remedy

Based on the facts outlined above, I respectfully submit this affidavit to lodge a formal complaint against Judge Patricia Muscarella, requesting a review of the judge's conduct and decisions during the hearing on October 1, 2024. I believe that the judge's actions regarding the prohibition of recordings, the failure to ensure the creation of an official record, and her concerning statement about not knowing the law on recusal warrant further investigation for potential violations of the Florida Code of Judicial Conduct, particularly in ensuring transparency, fairness, and the administration of justice.

Statement of Good Faith:

I hereby certify that this affidavit and the statements contained herein are made in good faith and are not for the purpose of harassment, delay, or any improper objective. I believe the issues raised are genuine and substantial and require appropriate investigation and resolution.

Further affiant sayeth naught.

Dated this 3 of October, 2024. Maureen Zilles

Signature of Affiant

SWORN TO AND SUBSCRIBED before me this 3rd day of October, 2024, by Maureen Zilles, who is personally known to me or has produced identification in the form of _____.

Christine Peters

Notary Public, State of Florida

My Commission Expires: 2-26-28

NOTARY PUBLIC STATE OF FLORIDA

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Karen Panarelli, who, after being duly sworn, deposes and states as follows:

My name is Karen Panarelli, and I reside at 746 Wildcat Wee Drive Palm Harbor, FL 34683 I am over the age of eighteen, and I am competent to make this affidavit. The statements made herein are based on my personal knowledge.

On October 1, 2024, at 12:00pm in Courtroom D, I attended a hearing in the case of Christopher Gleason v. Julie Marcus, Case No. 24-003717-CI and Case No. 24-003995-CI, presided over by Judge Patricia Muscarella at the Pinellas County Courthouse, located at 315 Court St. Clearwater, Florida, 33756. Christopher Gleason, acting as a pro se plaintiff, was present and participated in the proceedings.

At a previous hearing, Judge Muscarella issued explicit instructions prohibiting anyone in the courtroom from recording the proceedings via any technological means, including but not limited to audio or video recordings. This prohibition extended to all parties, witnesses, and observers in the courtroom.

Requirement to Shut Off Phones

At this hearing we were instructed by multiple law enforcement officers in the courtroom who directed all individuals present to not only silence their phones but to completely shut them off during the proceedings. This requirement was troubling to myself and other attendees, as it prevented us from using our phones to document important details during the hearing.

No Court Reporter Present

Despite the importance of the hearing and the prohibition on public recordings, there was no court reporter present to transcribe the proceedings. Furthermore, no official digital recording system appeared to be in operation during the hearing.

Judge Muscarella's Concerning Response Regarding the Law

During the hearing, Plaintiff Christopher Gleason, a pro se litigant, asked Judge Muscarella if he could serve her with his complaint for recusal and disqualification under Florida Rule of General Practice and

Judicial Administration 2.330, which governs judicial disqualification. Judge Muscarella responded by stating that she "did not know the law on that." This response is highly concerning as it indicates a potential lack of knowledge of the legal procedures that directly pertain to the judge's ability to preside fairly and impartially over the case.

a. Legal Knowledge: Judges are required by the Florida Code of Judicial Conduct, specifically Canon 3, to be familiar with and apply the law appropriately in all cases. A judge's admission of not knowing the law regarding a fundamental issue like judicial disqualification raises serious questions about their competence and ability to ensure a fair trial.

Legal Basis for Complaint

a. Failure to Provide an Official Record

Under Florida Rule of General Practice and Judicial Administration 2.535, an official court reporter or electronic recording system should be available to maintain the official record of proceedings, particularly in significant hearings. In this case, no official record was created, violating the requirement for maintaining a record of court proceedings.

b. Prohibition on Recording by the Public

While Florida Rule 2.450 allows a judge to restrict public recordings under specific circumstances, such as to ensure the fairness of proceedings, the prohibition of all forms of recording in the absence of an official court reporter conflicts with principles of transparency. According to Article I, Section 24(a) of the Florida Constitution, the public has the right to access public records, including judicial records, unless specific statutory exceptions apply.

c. Use of Electronic Devices

The law enforcement officers' instructions to shut off phones rather than merely silence them conflicts with Florida Rule of General Practice and Judicial Administration 2.451, which only requires devices to be silenced unless they are causing disruption in the courtroom. Requiring complete phone shutdown exceeds the permissible limits outlined in the rule.

Concern About Judicial Competency

Judge Muscarella's statement that she did not know the law regarding service of a recusal motion is particularly alarming. Florida Rule of General Practice and Judicial Administration 2.330 provides clear guidance on disqualification of judges, including the procedure for serving motions. Judges are required

to possess a thorough knowledge of this rule, especially in cases involving allegations of bias or impartiality.

Harm and Potential Prejudice

The prohibition on recording and the absence of any official record of the hearing create significant concerns regarding transparency and potential prejudice. Furthermore, Judge Muscarella's apparent lack of familiarity with the law on recusal raises serious doubts about whether Christopher Gleason, as a pro se plaintiff, will receive a fair and impartial hearing. The judge's failure to correctly apply or even know the relevant legal standards undermines the integrity of the judicial process and could lead to future procedural or substantive errors.

Request for Review and Remedy

Based on the facts outlined above, I respectfully submit this affidavit to lodge a formal complaint against Judge Patricia Muscarella, requesting a review of the judge's conduct and decisions during the hearing on October 1, 2024. I believe that the judge's actions regarding the prohibition of recordings, the failure to ensure the creation of an official record, and her concerning statement about not knowing the law on recusal warrant further investigation for potential violations of the Florida Code of Judicial Conduct, particularly in ensuring transparency, fairness, and the administration of justice.

Statement of Good Faith:

I hereby certify that this affidavit and the statements contained herein are made in good faith and are not for the purpose of harassment, delay, or any improper objective. I believe the issues raised are genuine and substantial and require appropriate investigation and resolution.

Further affiant sayeth naught.

Dated this 3RD of OCTOBER, 2024. Karen Parrarelli

Signature of Affiant

SWORN TO AND SUBSCRIBED before me this 3rd day of October, 2024, by Karen Parrarelli, who is personally known to me or has produced identification in the form of _____.

Christine Peters

Notary Public, State of Florida

My Commission Expires: 2-26-28

NOTARY PUBLIC STATE OF FLORIDA

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF Regina Hansen

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Regina Hansen, who, being first duly sworn, deposes and states as follows:

1. My name is Regina Hansen, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9-19-24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

R Hansen

Witness Name Regina Hansen
Address 2427 Finlandia Ln Apt 41, Clearwater, FL 33763
Phone Number 727-788-2772

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Christine Peters

Notary Public, State of Florida

My Commission Expires: _____

NOTARY PUBLIC STATE OF FLORIDA
CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

NOTARY PUBLIC STATE OF FLORIDA
CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

NOTARY PUBLIC STATE OF FLORIDA
CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF RICHARD GREENWOOD

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared RICHARD GREENWOOD, who, being first duly sworn, deposes and states as follows:

1. My name is RICHARD GREENWOOD, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9/19/24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

RMG

Witness Name RICHARD GREENWOOD
Address 105 HARBOR BLUFF DR.
Phone Number 951. 375-9683

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Christine Peters

Notary Public, State of Florida My Commission Expires: _____

NOTARY PUBLIC STATE OF FLORIDA
CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Tab O – Affidavit of Christine Peters and Christopher Gleason Requests For Grand Jury Investigation to Chief Judge Shawn Crane August 19, 2024 and August 20, 2024

EXHIBIT J:

Affidavit of Christine Peters for 219 individual Grand Jury Investigation Requests to Chief Judge Shawn Crane, August 19, 2024

AFFIDAVIT OF CHRISTINE PETERS

STATE OF FLORIDA
COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Christine Peters, who, after being duly sworn, deposes and states under penalty of perjury:

My name is Christine Peters, a Pinellas County resident and voter and I reside at 1321 Arden Avenue Clearwater, Pinellas County Florida 33755. I am over 18 years of age and competent to make this affidavit based on my personal knowledge.

Starting in February 2024, I collected affidavits from Pinellas County voters requesting a Pinellas County grand jury investigation.

The Pinellas County grand jury request involved investigating possible election crimes and interference of the voters casting their ballots and having their votes accurately counted, by Julie Marcus, Pinellas County Supervisor of Elections, Dustin Chase, Deputy Supervisor of Elections and 99 other John and Jane Does. I collected a total number of 219 affidavits.

I began researching how to get the affidavits to the correct person in Pinellas County government that would be able to get these to the, then current, County grand jury. After numerous phone calls and in person visits to various departments in Pinellas County government including but not limited to the Pinellas County Clerk of the court, I was informed that the Chief Justice of the Sixth Circuit Court presides over the County grand jury, which is currently and was then, Chief Judge Shawn Crane.

Per Judge Shawn Crane's Judicial Assistant, Louise Smith, On June 25, 2024, I mailed, by certified, return receipt requested five (5) of the above-mentioned affidavit requests to Judge Shawn Crane 14250 49th Street North Room J4210, Clearwater, Fl 33762.

I received confirmation of delivery receipt of the above-mentioned affidavits from the US Postal Service on July 8, 2024.

I did not receive any communication or acknowledgement from Judge Crane in reference to the affidavits mentioned above or the investigation requests.

After waiting an extended period of time (August 19, 2024), and not receiving any acknowledgement, I hand delivered the 219 request for investigation affidavits along with my name and contact information to 14250 49th Street North, Clearwater, Fl, 33762 specifically to the Judicial Reception, Room 3500, located in the Pinellas County Judicial Center lo0cated at: 14250 49th St N. Clearwater, FL. 33762, which is where I was directed by an officer in the courthouse, and was told that delivering the affidavits to the above mentioned room is the process of getting mail delivered to Chief Justice Shawn Crane.

To date, I have not received any communication from Judge Shawn Crane or any of his assistants in reference to this matter.

Under penalty of perjury, I hereby declare and affirm that the above-mentioned statement is, to the best of my knowledge, true and correct.

FURTHER AFFIANT SAYETH NAUGHT.

Dated: March 3, 2025

Christine Peters
1321 Arden Ave.
Clearwater, FL. 33755

Affiant's Signature Christine Peters

NOTARY ACKNOWLEDGEMENT

STATE OF FLORIDA
COUNTY OF PINELLAS

On this 3rd day of March, 2025, before me, a Notary Public in and for the State of Florida, personally appeared Christine Peters, who is personally known to me, and who executed the foregoing affidavit and acknowledged she executed it freely and voluntarily for the purposes therein expressed, under oath.

Notary's Signature: _____
Notary Public, State of Florida

Notary's Printed Name: Amber Towe

Commission No.:
My Commission Expires:

(Notary Seal)

AMBER TOWE
MY COMMISSION # HH 637898
EXPIRES: September 1, 2028

EXHIBIT K:

Appellant's Affidavit Regarding Grand Jury Investigation Request to Pinellas Circuit Court Chief Justice Shawn Crane, August 20, 2024.

AFFIDAVIT OF CHRISTOPHER GLEASON
REGARDING GRAND JURY INVESTIGATION REQUEST MADE
WITH CHIEF JUSTICE SHAWN CRANE

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Christopher Gleason, who, being duly sworn, deposes and says:

1. I, **Christopher Gleason**, declare under penalty of perjury that the following is true and accurate to the best of my knowledge and belief.
2. I am a Pinellas County resident, and a Pinellas County taxpayer.
3. I am over the age of 18 and competent to make this affidavit.
4. I have firsthand knowledge of the facts stated herein.
5. I was a qualified candidate for Pinellas County Supervisor of Elections in 2024.
6. I was a qualified elector in the 2024 Presidential Preference Primary, 2024 Primary Election and the 2024 General Election.
7. I am the Appellant in Case No. 2D2024-2687 and Case No. 2D2024-2688 and Plaintiff in Case Nos. 24-003717CI and 24-003995-CI in the Circuit Court of the Sixth Judicial Circuit, Pinellas County, Florida.
8. On August 20, 2024 I personally as a qualified candidate and qualified elector made a in person, in writing request for a Pinellas County Grand Jury Investigation into Julie Marcus and her coconspirators election fraud and official misconduct.

9. I made this in person in writing request for a grand jury investigation at 14250 49th Street, North, Clearwater, FL 33762, specifically to the Judicial Reception Room 3500, located in the Pinellas County Judicial Center located at 14250 49th St N Clearwater FL 33762, which is where I was directed by an sheriff deputy officer of the courthouse.
10. I was told that delivering the affidavit to the above mentioned room is the process of getting mail delivered to Pinellas County Circuit Court Chief Justice Shawn Crane.
11. These facts are true to my knowledge and belief.

FURTHER AFFIANT SAYETH NAUGHT.

Dated: March 13, 2025

/s/ Christopher Gleason

Christopher Gleason
2098 Seminole Blvd #62122
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com , gleasonforpinellas@gmail.com

STATE OF FLORIDA

COUNTY OF PINELLAS

Sworn to and subscribed before me this 13th day of March, 2025, by Christopher Gleason, who is personally known to me (or who produced identification: FL Driver License).

Notary Public, State of Florida

Name: Scott Suprenant

Commission No.: HH 506057

My Commission Expires: July 14, 2028

[Notary Seal]

SCOTT SUPRENANT
Notary Public
State of Florida
Comm# HH506057
Expires 7/14/2028

Tab P – Affidavit of John Siamas: Confirms fraudulent ballot requests and conflicts.

AFFIDAVIT OF JOHN SIAMAS

REGARDING CHAIN OF CUSTODY FOR STATEWIDE VOTE BY MAIL

REPORTS AND THE IRREGULARITES OBSERVED WITH THE DATA

STATE OF FLORIDA)
) ss:
COUNTY OF PINELLAS)

Before me, the undersigned authority, personally appeared John Siamas, who, being duly sworn, states as follows:

Affiant's Identity

1. I, John Siamas, was a Republican candidate for the Florida State Sente District 21 Primary Election held on August 20th, 2024. I am over 18 and competent to make this affidavit and have personal knowledge of the facts stated herein.

Purpose of Affidavit:

2. This affidavit is made to establish the chain of custody for the Statewide Vote-By-Mail Report ("VBM") that I obtained directly from the Florida Division of Elections at the following url:

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports

Acquisition of Voting List:

3. I personally accessed the Florida Division of Elections secure online system for authorized individuals as clearly stated in FL Stat 101.62 and FAC 1S-2.043. I used the following secure URL

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports

provided to me by the Division of Elections to download the daily updates of the Statewide Vote-By-Mail Early Voting List.

Secure Download Process:

4. The Florida Division of Elections provided me access to the Voting List via the following secure link

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports ,

which required my unique login credentials provided by the Division. These credentials were assigned specifically for my use as a registered recipient of the Voting List after directly registering with the State at the following url:

https://countyballotfiles.floridados.gov/Account/Register

Receipt of Voting List:

5. Upon logging into the secure platform, I downloaded the Vote-By-Mail report, which was provided in .txt and/or .zip format. I saved the downloaded files directly to my computer under secure conditions, ensuring that the data was not altered.

Handling and Storage:

6. After downloading the Vote-By-Mail report, I took immediate steps to preserve the integrity of the data. The files were securely stored on my computer, which is protected by encryption and password protection. No unauthorized individuals had access to the Voting List from the time I downloaded it until it was submitted in connection with this case.

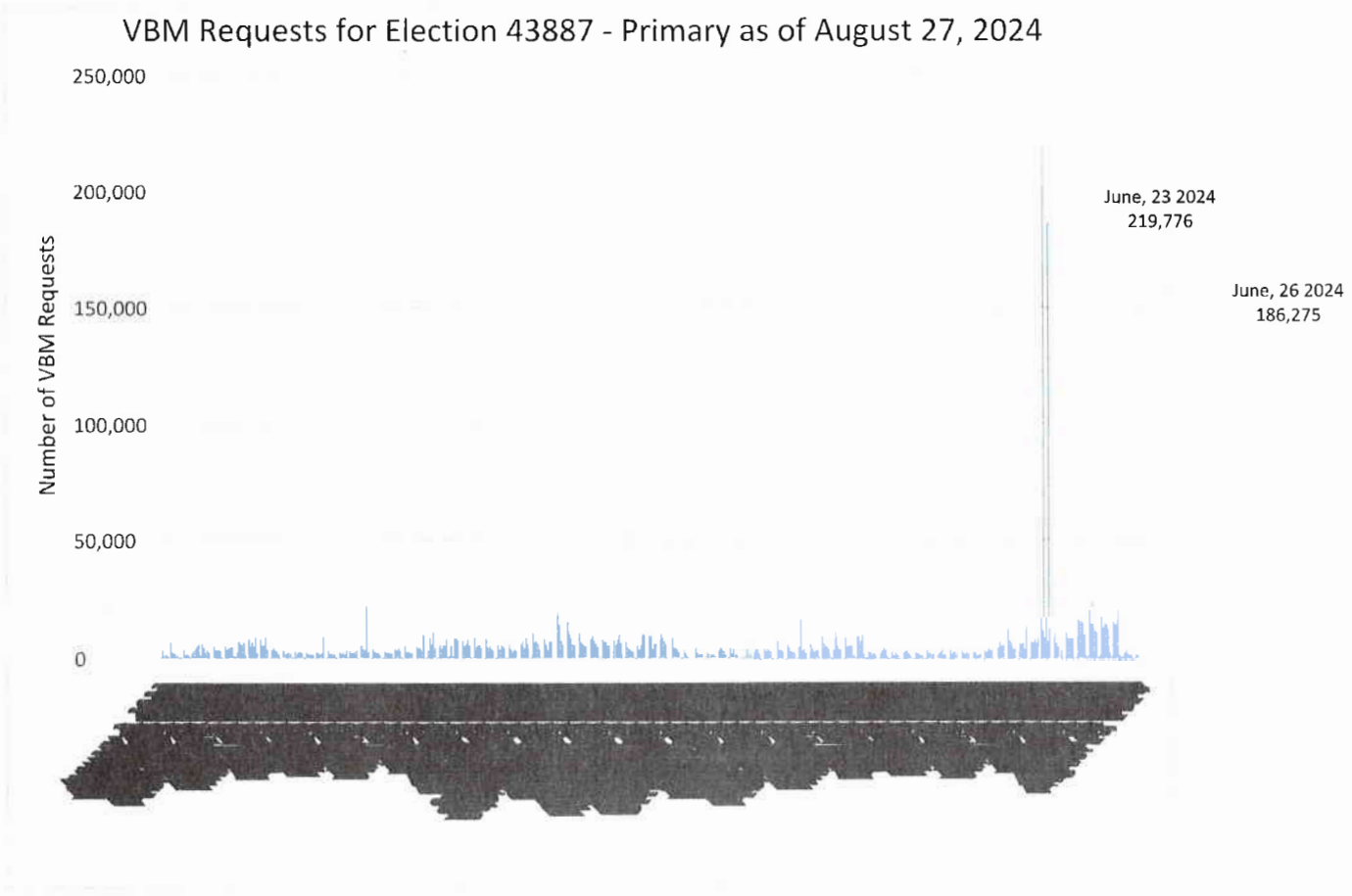
Integrity of the Data:

7. I affirm that the Voting List downloaded from the Florida Division of Elections has not been altered, modified, or tampered with in any way. The files I obtained are in the same condition as when I downloaded them directly from the Division's secure platform.

Irregularities and Anomalies with the Vote-By-Mail Ballots

8. Here are the following anomalies and irregularities in the vote-by-mail ballots and the system implemented to administer the vote-by-mail ballots:

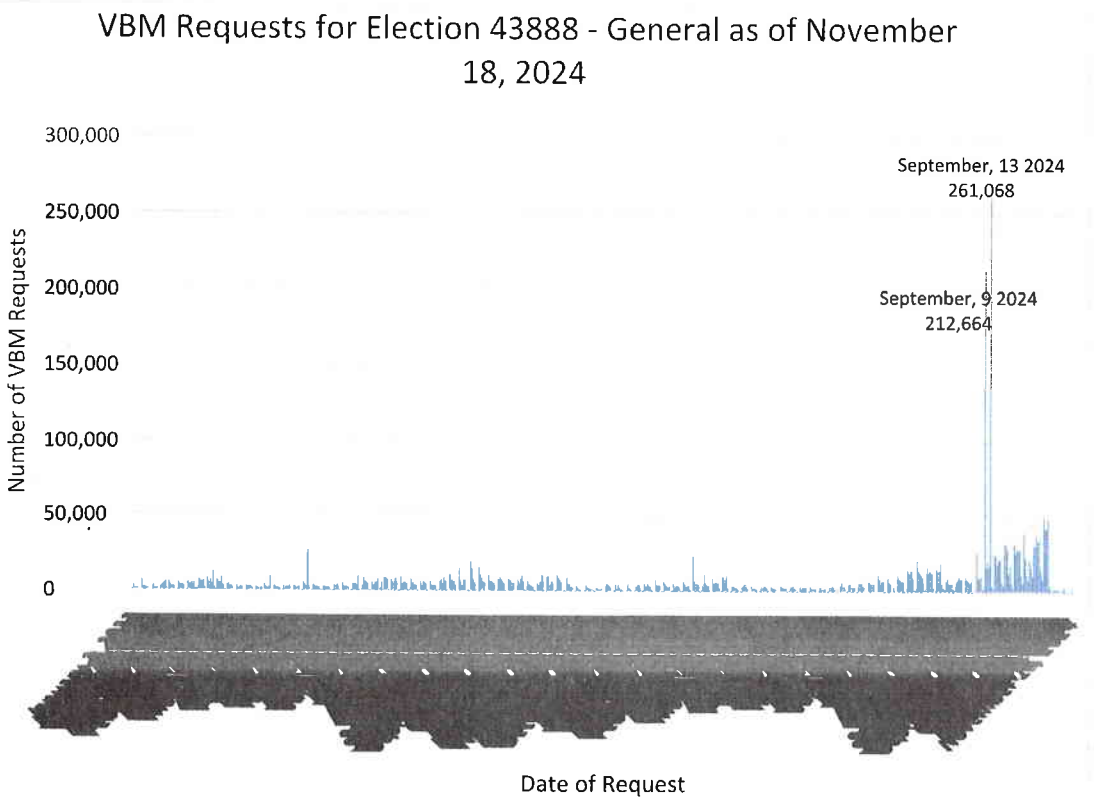
(1) When observing the vote-by-mail ballot (VBM) request data as of August 27, 2024, provided by the Florida Division of Elections for the primary elections, I noticed two very unusual outliers in the requests made. Here is a visualization of the daily requests made across the entire state in 2024:



(2) The two extreme outliers represent two dates, Sunday June 23, 2024, and Wednesday June 26, 2024. The number of vote-by-mail ballot requests made on June 23, 2024, was 219,776. The number of vote-by-mail ballot requests made on Wednesday June 26, 2024, was 186,275. The following is a factual analysis of these anomaly for the county of Pinellas:

a. On Sunday June 23, 2024, of the total 219,779 vote-by-mail ballot requests made, 219,675 vote-by-mail ballots requested were made from the Pinellas County Supervisor of Elections office. Of those 219,675 vote-by-mail requests from Pinellas County, according to the VBM Report dated August 27, 2024, provided by the State, 219,628 (99%) did not provide a Driver's License or Last 4 of SSN as part of the request. This is indicated by a "N" designator in the columns for the "FLDL/StatelD" and "VoterSSN4" in the report.

(3) When observing the vote-by-mail ballot (VBM) request data as of November 18, 2024, provided by the Florida Division of Elections for the general elections, I again noticed two very unusual outliers in the requests made. Here is a visualization of the daily requests made across the entire state in 2024:



(4) A The two extreme outliers represent two dates, Monday September 09, 2024, and Friday September 13, 2024. The number of vote-by-mail ballot requests made on September 09, 2024, was 212,664. The number of vote-by-mail ballot requests made on September 13, 2024, was 261,068. The following is a factual analysis of this anomaly for the county of Pinellas:

a. On Monday September 09, 2024, of the total 212,664 vote-by-mail ballot requests made, 196,037 vote-by-mail ballots requested were made from the Pinellas County Supervisor of Elections office. Of those 196,037 vote-by-mail requests from Pinellas County, according to the VBM Report dated November 18, 2024, provided by the State, 195,280 (99%) did not provide a Driver's License or Last 4 of SSN as part of the request. This is indicated by a "N" designator in the columns for the "FLDL/StatelD" and "VoterSSN4" in the report.

9. The following is a list of Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in both the Primary and General Elections per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judge	Campbell, Kim	107167732
Pinellas 6th Circuit Judge	Campbell, Pamela A	106758700
Pinellas 6th Circuit Judge	Coleman, Sherwood	106876672
Pinellas 6th Circuit Judge	Gnage, Brian	107285314

Pinellas 6th Circuit Judge	Handsel, Mary M.	106814594
Pinellas 6th Circuit Judge	Jirotka, George M.	106817396
Pinellas 6th Circuit Judge	Loar, Doneene	107338189
Pinellas 6th Circuit Judge	Matthey, Philippe	107385240
Pinellas 6th Circuit Judge	Moore, Patrice	106958587
Pinellas 6th Circuit Judge	Muscarella, Patricia A	106784723
Pinellas 6th Circuit Judge	Newton, Cynthia J	107071107
Pinellas 6th Circuit Judge	Ramsberger, Thomas M	107143704
Pinellas 6th Circuit Judge	Riba, Joshua	106991733
Pinellas 6th Circuit Judge	Siracusa, Pat	106772419
Pinellas 6th Circuit Judge	Todd, Kimberly	106869683
Pinellas 6th Circuit Judge	Westine, Lauralee G	106972664
Pinellas 6th Circuit Judge	Helinger, Jack	114340336

10. The following is a list of Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judge	Federico, Philip J.	106986554
Pinellas 6th Circuit Judge	Pearlman, Nicole	100554220
Pinellas 6th Circuit Judge	Stearns, James R	10675087

		8
Pinellas 6th Circuit Judge	Williams, Amy M	10671588 4

11. The following is a list of Judicial Assistants for Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in both the Primary and General Elections per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judge Judicial Assistant for Judge Steve Berlin	Vincent, Melinda	10687348 2
Pinellas 6th Circuit Judge Judicial Assistant for Judge Kim Campbell	Hughes, Cyndi	10694121 2
Pinellas 6th Circuit Judge Judicial Assistant for Judge Pamela Campbell	Miele, Joann	10694521 7
Pinellas 6th Circuit Judge Judicial Assistant for Judge Elizabeth Jack	Leis, Amber	11738446 0
Pinellas 6th Circuit Judge Judicial Assistant for Judge Philip J. Federico	Psenisky, Jill	10697832 8
Pinellas 6th Circuit Judge Judicial Assistant for Judge Jack Hellinger	Scholl, Mary	10717672 5
Pinellas 6th Circuit Judge Judicial Assistant for Patricia Moore	Trosky, Raelynn	10714588 9

12. The following is a list of Judicial Assistants for Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT

provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State:

Title	Name	Voter ID
Pinellas 6th Circuit Judge Judicial Assistant for Judge Joseph Bulone	Nguyen, Annie	107054797

13. The following is a list of Relatives to the Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Relative of Judge Julie L Sercus	SERCUS, ELIZABETH A	123610805
Relative of Judge Julie L Sercus	SERCUS, FAITH A	111895803

14. The following is a list of County Judges of the Sixth Judicial Circuit of Florida and their Assistants, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judicial County Judge	Carassas, John	106835464
Pinellas 6th Circuit Judicial County Judge	Jagger, Edwin	106832762
Pinellas 6th Circuit Judicial County	Pierce, James	10681510

Judge		1
Pinellas 6th County Judicial Assistant for Judge Edwin Jagger	Hall, Michelle	106720023
Pinellas 6th County Judicial Assistant for Judge Theodora Komninos	Masterson, Vicki	107150747
Pinellas 6th County Judicial Assistant for Judge Kelly Lorraine	Caffentzis, Joan	106926631
Pinellas 6th County Judicial Assistant for Judge Cathy McKyton	Nierengarten, Cheryl	107033524

15. The following is a list of the Florida Second District Court of Appeal Judges and their relatives, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
2nd DCA	Silberman, Morris	106869196
2nd DCA	Villanti, Craig C	113787369
2nd DCA	Khouzam, Nelly	106723453
Relative of Judge Matthew C Lucas of the 2ND DCA	Lucas, Cheryl L	107285166
Relative of Judge Susan H Rothstein-Youakim of the 2ND DCA	Rothstein, Rita M	122458841
Relative of Judge Susan H Rothstein-Youakim of the 2ND DCA	Rothstein, Arthur S	122246266

16. The following is a list of the Florida Supreme Court Judges, their assistants, and their relatives, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT

provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Supreme Court of Florida	Couriel, John D	117954867
Judicial Assistant to Supreme Court Judge Charles Canady	Williams, Brenda	109108119
Relative of Judge Jorge Labarga	Labarga, Maria A	110265650

17. The following is a list of Senior Assistant Pinellas County Attorneys in Pinellas County, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Senior Assistant Pinellas County Attorney	Sadowsky, David	106906875
Senior Assistant Pinellas County Attorney	Sanzeri, Carole	106790228
Senior Assistant Pinellas County Attorney	Schaefer, John	106839614
Senior Assistant Pinellas County Attorney	Ester, Jason	107005833
Senior Assistant Pinellas County Attorney	LeBlanc, Christina	107056302
Senior Assistant Pinellas County Attorney	Morrissey, Joseph	125661447
Senior Assistant Pinellas County Attorney	Steg, Betsy	106931757

18. The following is a list of Assistant County Attorneys and County Attorneys in Pinellas County, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Assistant County Attorney	Barrera, David	118419022
Assistant County Attorney	Kahn, Jared	111191787
Assistant County Attorney	Klein, Jeffrey	106650848
Assistant County Attorney	Lewis, Kelly	125247381

Title	Name	Voter ID
County Attorney	White, Maria	107153397

19. The following is a list of State Attorney for the Sixth Judicial Circuit of Florida Pinellas County and their relatives, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	Bruce, Robert	107387209
State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	Williams, Emily	107417811
Division Directory for the Sixth	Sullivan, Courtney	11772388

Judicial Circuit of Florida Pinellas County		0
Division Directory for the Sixth Judicial Circuit of Florida Pinellas County	Koskinas, Thomas	10720347 3
Division Directory for the Sixth Judicial Circuit of Florida Pinellas County	Hill, Karen	10680884 5
State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	Festa, Noelle	10712513 7
Relative of Nathan Vonderheide State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	VONDERHEIDE, EMILY A	11983606 2
Relative of Noelle Festa State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	FESTA, THOMAS V	11453851 7

20. The following is a list of other significant individuals, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Relative of Pinellas County Sheriff Robert Gualtiere, Judge Lauralee G Westine	WESTINE, LAURALEE G	10697266 4
Supervisor of Election Pinellas County	Marcus, Julie	10707564 3
County Commissioner on Canvassing Board	POLSON, HERBERT E	10673556 2
County Commissioner on Canvassing Board	PETERS, KATHLEEN M	10689409 2

Filing # 221986820 E-Filed 04/29/2025 09:25:07 AM

IN THE SECOND DISTRICT COURT OF APPEAL
STATE OF FLORIDA

CHRISTOPHER GLEASON

Appellant/Petitioner,

vs.

JULIE MARCUS, et. al.,

Appellees/Respondents

Case No. 2D2024-2687; 2D2024-2688

L.T. Case No. 522024CA003717; 522024CA003995

AMENDED AND SUPPLEMENTED MOTION TO DISQUALIFY COUNTY ATTORNEYS AND BAR USE OF TAXPAYER FUNDS FOR DEFENSE

COMES NOW, Appellant Christopher Gleason, pro se, and respectfully moves this Honorable Court to disqualify Attorneys Kelly Vicari, Jared Kahn, Jeffrey Klein, and all other attorneys from the Pinellas County Attorney's Office from representing Appellees in this matter, and to prohibit the use of public funds for their defense. This motion is based on disqualifying conflicts of interest, ethical violations, unlawful public expenditures, and structural due process violations arising from an alleged vote-by-mail (VBM) fraud scheme. The motion is brought pursuant to Florida Rule of Appellate Procedure 9.300; Florida Statutes §§ 111.07, 104.0616, 104.13, 838.022, 97.0585, 119.07; 18 U.S.C. §§ 1341, 1343; 52 U.S.C. §

20511; Florida Rules of Professional Conduct 4-1.7, 4-3.7, 4-1.10, 4-3.4, 4-8.4; and controlling case law.

I. FACTUAL BASIS FOR DISQUALIFICATION AND RELIEF REQUESTED

1. On June 23, 2024, 219,673 VBM ballots were illegally requested in Pinellas County, followed by 196,055 on September 9, 2024, without the voter having provided the statutory required identification verification upon request, violating Fla. Stat. § 101.62(1)(b), as evidenced by Florida Division of Elections VBM reports (Exhibit B, EXHIBITS A_Q.pdf; Exhibit B, attached). This mass-scale fraud undermines the 'right to vote' and 'equal protection' in the 'manner of its exercise,' per *Bush v. Gore*, 531 U.S. 98, 104-05 (2000), and necessitates disqualification and transparency.

2. These mail ballot requests included ballots for one unprotected voter, Jeffrey Klein, whose record was misused as part of systemic Florida Voter Registration System (FVRS) manipulation, and two protected voters, County Attorney Jared Kahn and Branden M. Vicari, the husband of County Attorney Kelly Vicari, as shown in VBM reports (Exhibit B, attached). A marriage record confirms Vicari's spousal connection (Exhibit A). Due to their protected status under Fla. Stat. § 97.0585, Kahn and Vicari were procedurally unable

to request VBM ballots online, as confirmed by a screenshot of the protected voter lock on the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov, Exhibit C, Exhibit G) and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf).

3. The unauthorized VBM requests, flagged as "N/N" (no ID provided) includes a Sunday submission on June 23, 2024, when the Supervisor of Elections' office was closed (Exhibit C, EXHIBITS A_Q.pdf). This constitutes prima facie evidence of and internal control override of election system fraud protections, false entry into official election records, and VBM fraud, as detailed in Appellant's affidavit (Exhibit D, attached). The "N/N" status and Sunday submission refute claims of legitimate requests, as no authorized mechanism existed for these submissions.

4. Attorneys Kahn and Klein, who represent Appellees, are material witnesses to, victims of, participants in, and/or beneficiaries of the alleged election fraud, as their voter records were misused (Exhibit B), creating disqualifying conflicts under Rule 4-3.7 (lawyer as witness) and Rule 4-1.7 (personal interest), Florida Rules of Professional Conduct. Their roles as government attorneys at the

Pinellas County Attorney's Office are confirmed by Florida Bar profiles (Exhibit F).

5. Attorney Vicari, whose husband Branden M. Vicari was also affected (Exhibits A, B), is personally entangled in the misconduct, creating a direct and substantial conflict of interest due to her spousal relationship. See *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009).

6. The County Attorneys sought to seal all exhibits, including official election records, VBM reports (Exhibit B) and publicly available public records and material widely available on the internet, to conceal any evidence of fraud implicating defendants, themselves, Vicari's husband, and judicial officers (Exhibit O, EXHIBITS A_Q.pdf), as evidenced by Jared Kahn's email and draft sealing order (Exhibit E, Pages 21-22). The resulting court orders (Exhibit E, Pages 23-27), granted by Judge Patricia Muscarella, are overbroad, encompassing non-exempt records without specific exemptions, violating Fla. Stat. § 119.07. This demonstrates bad faith under Fla. Stat. § 111.07, as *Times Publishing Co. v. Burke*, 375 So. 2d 297, 300 (Fla. 2d DCA 1979), and *Wait v. Florida Power & Light Co.*, 372 So. 2d 420, 424 (Fla. 1979), mandate narrowly tailored restrictions.

7. The Supervisor of Elections' office obstructed lawful requests for forensic audit data, claiming production of the requested data would take 19,000 hours to complete (Exhibit N, EXHIBITS A_Q.pdf), displaying a pattern of concealment consistent with the sealing effort (Exhibit E), implicating internal use of override credentials to falsify records, and establishing willful and knowing prima facie evidence of Official Misconduct a violation of 838.022 F.S.

8. Multiple judicial officers, including trial judges and assistants, had their protected VBM statuses overridden (Exhibit O), as corroborated by the VBM reports and protected voter lock system in place (Exhibits B, C), indicating a systemic misconduct reaching the judiciary. The sealing orders by Judge Patricia Muscarella (Exhibit E, Pages 23-27), potentially influenced by conflicted attorneys (Exhibits B, F), further taint the tribunal. This entanglement violates the *'basic requirement of due process'* for a *'fair trial in a fair tribunal,'* as held in *In re Murchison*, 349 U.S. 133, 136 (1955), and *Berger v. United States*, 295 U.S. 78, 85 (1935), necessitating recusal to prevent *'even the probability of unfairness.'*

9. This widespread misconduct establishes a cascade conflict, a systemic failure and structural error where attorneys,

election officials, and judicial officers are entangled as victims of, witnesses to, and/or participants, and/or beneficiaries of the same fraud, rising to a structural due process violation that dwarfs the structural errors per *Rogers v. State*, 630 So. 2d 513 (Fla. 1993), and aligns with *Williams v. Pennsylvania*, 579 U.S. 1, 8-9 (2016), which held '*an unconstitutional potential for bias*' creates a structural defect, and (*Young v. United States*, 481 U.S. 787, 803-04 (1987)), requiring disqualification for conflicted counsel.

II. VIOLATIONS OF FLORIDA LAW, FEDERAL LAW, AND BAR RULES

10. Under F.S. § 111.07, public officials are not entitled to taxpayer-funded defense if they act in bad faith or outside their duties. The County Attorneys' sealing of public VBM reports (Exhibit E) and representation, despite personal entanglement (Exhibits A, B, F), demonstrate bad faith, disqualifying the use of public funding. See *Thornber v. City of Fort Walton Beach*, 568 So. 2d 914 (Fla. 1990) and *Lomax v. City of Miami*, 977 So. 2d 677, 679 (Fla. 3d DCA 2008), which held that Fla. Stat. § 111.07 does not authorize funding for bad-faith actions that '*do not serve a public purpose.*'

11. The unauthorized VBM requests for Kahn, Klein, and Vicari's husband (Exhibit B), which has been confirmed as an

impossibility for protected voters, as shown by the protected voter lock on the Supervisor of Elections' website (Exhibit C, Exhibit G), violate F.S. §§ 104.0616 (VBM fraud), 104.13 (false returns), and 838.022 (official misconduct), as well as 18 U.S.C. §§ 1341, 1343 (wire/mail fraud) and 52 U.S.C. § 20511 (federal election fraud).

12. The override of voters with protected status (Exhibits A, B, C, G), is in violation of Fla. Stat. § 97.0585, because confidential voter records were accessed without authorization, constituting:

(a) A civil claim under Fla. Stat. § 119.07 for record manipulation, exacerbated by sealing (Exhibit E);

(b) A criminal charge under Fla. Stat. § 104.13 for false returns;

(c) A violation of F.S. § 838.022 for official misconduct;

13. The sealing effort (Exhibit E, Pages 21-27) violates Fla. Stat. § 119.07 by obstructing access to non-exempt VBM reports (Exhibit B), ignoring redaction options under Fla. Stat. § 119.07(2)(b), and demonstrating an intent to conceal fraud, as evident in Jared Kahn's email (Exhibit E, Page 21) which sought to seal all exhibits despite discussing only Exhibit G. This disqualifies the use of public funding for attorneys under Fla. Stat. § 111.07, and violates Rule 4-

8.4 (misconduct). *Times Publishing Co. v. Burke*, 375 So. 2d 297, 300 (Fla. 2d DCA 1979), mandates that restrictions be '*narrowly tailored*,' and *Wait v. Florida Power & Light Co.*, 372 So. 2d 420, 424 (Fla. 1979), emphasizes the public's right to inspect records, rendering the sealing order impermissible.

14. Under the Florida Rules of Professional Conduct:

(a) Rule 4-1.7 bars representation when personal interests, such as those identified with Kahn, Klein, and Vicari's entanglement (Exhibits A, B, F), materially limit advocacy. Even if unaware, their witness status (Exhibit B) and sealing effort (Exhibit E) demonstrate a personal stake, as *Young v. United States*, 481 U.S. 787, 803-04 (1987), warned that '*counsel's personal interest in the outcome*' impairs fairness, requiring disqualification.

(b) Rule 4-3.7 prohibits Kahn and Klein from serving as advocates, as their VBM records make them material witnesses (Exhibit B). *Anderson v. State*, 420 So. 2d 574, 576 (Fla. 1982), mandates disqualification when an attorney's testimony compromises judicial integrity, a principle applicable to their dual roles.

(c) Rule 4-1.10 imputes conflicts with all County Attorneys, as the pervasive fraud (Exhibits B, O) and sealing effort (Exhibit E) preclude impartial representation in this small office (21-50 attorneys, Exhibit F). *State v. Michaels*, 454 So. 2d 560, 562 (Fla. 1984), held that conflicts in small firms are imputed due to the close professional relationships.

(d) Rule 4-3.4(a) was breached by obstructing evidence through the sealing of exhibits (Exhibit E).

(e) Rule 4-8.4, which involves dishonesty and prejudice to justice, was also violated due to the sealing of exhibits (Exhibit E).

13. In *Moakley v. Smallwood*, 826 So. 2d 221 (Fla. 2002), the Florida Supreme Court upheld sanctions for litigation conduct which undermined judicial integrity, a close parallel applicable to the sealing of exhibits in this case (Exhibit E).

14. *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009) holds that the probability of bias by attorneys who are entangled as witnesses (Exhibits A, B, F), is constitutionally intolerable.

15. *Tumey v. Ohio*, 273 U.S. 510 (1927) establishes that a personal interest, such as Vicari's spousal conflict (Exhibit A), violates the Fourteenth Amendment.

16. *Rogers v. State*, 630 So. 2d 513 (Fla. 1993) confirms that cumulative bias, as evidenced by the attorneys' conflicts and sealing actions (Exhibits A, B, C, E, F), constitutes structural error, not subject to harmless-error review.

III. SYSTEMIC CASCADE CONFLICT AND STRUCTURAL ERROR BREAKDOWN

17. This case presents a cascade conflict, a systemic failure where County Attorneys (Exhibits A, B, F), election officials (Exhibit N), and judicial officers (Exhibit O) are entangled as victims of, witnesses to, and/or participants in, and/or beneficiaries of the same VBM fraud, as confirmed by the protected voter lock (Exhibit C, Exhibit G) and sealing effort (Exhibit E). Table 1 summarizes this entanglement. As *Williams v. Pennsylvania*, 579 U.S. 1, 8-9 (2016), articulated, '*an unconstitutional potential for bias exists when the same person serves as both accuser and adjudicator,*' necessitating disqualification.

18. Table 1: Cascade Conflict Entanglement:

Party	Role	Conflict Evidence	Exhibit	Legal Basis
Kelly Vicari	County Attorney	Spousal conflict via husband's VBM misuse	A, B, F	Rule 4-1.7, Caperton
Jared Kahn	County Attorney	Witness/victim via VBM misuse, sealing proponent	B, E, F	Rule 4-3.7, Young
Jeffrey Klein	County Attorney	Witness/victim via VBM misuse	B, F	Rule 4-3.7, Young
County Attorney's Office	Counsel	Imputed conflict in small office	F, O	Rule 4-1.10, Michaels
Election Officials	Defendants	Audit obstruction, fraud facilitation	N	F.S. § 104.0616
Judicial Officers	Tribunal	VBM status overrides	O	In re Murchison, Berger

19. The sealing of public records (Exhibit E, Pages 21-27) obstructs the tribunal's ability to evaluate systemic fraud, undermining judicial neutrality and reflecting an institutional collapse of ethical safeguards. The overbroad court orders (Exhibit E, Pages 23-27), influenced by conflicted attorneys (Exhibits B, F), exacerbate this cascading conflict, necessitating

vacatur; see *Times Publishing Co. v. Burke*, 375 So. 2d 297, 300 (Fla. 2d DCA 1979).

20. This entanglement violates the constitutional guarantee of due process under the Florida Constitution (Article I, § 9) and U.S. Constitution (Fourteenth Amendment), threatening the impartiality of the tribunal itself. *In re Murchison*, 349 U.S. 133, 136 (1955), mandated an '*absence of actual bias*' and prevention of '*the probability of unfairness*,' and *Berger v. United States*, 295 U.S. 78, 85 (1935), requires avoiding any '*appearance of bias*' to maintain public confidence, thus necessitating the disqualification of conflicted attorneys, and recusal of affected judicial officers (Exhibit O).

21. Judicial recusal and attorney disqualification are constitutionally mandated to preserve the integrity of these proceedings, as held in *Caperton* and *Tumey*.

22. The cascade conflict, exacerbated by the sealing efforts (Exhibit E), undermines public confidence and violates Appellant's right to a neutral tribunal. By compromising electoral integrity, this misconduct threatens the '*equal protection*' of voting rights, as *Bush v. Gore*, 531 U.S. 98, 104-05 (2000), warned against '*arbitrary and*

disparate treatment' in vote processing, dwarfing the trial-specific bias in *Rogers*.

IV. PRAYER FOR RELIEF

WHEREFORE, Appellant respectfully requests this Court:

1. Disqualify Kelly Vicari, Jared Kahn, Jeffrey Klein, and all attorneys affiliated with the Pinellas County Attorney's Office, from representing Appellees, due to their conflicts of interest (Exhibits A, B, C, E, F).

2. Bar the use of taxpayer funds for Appellees' defense, as their ultra vires, criminal, and bad-faith misconduct (Exhibits B, E) violates Fla. Stat. § 111.07.

3. Refer these matters to the Florida Bar for investigation and discipline of violations to Rules 4-1.7, 4-3.7, 4-1.10, 4-3.4, 4-8.4 (Exhibits A, B, E, F).

4. Direct the immediate production of the VR Systems Voter Focus audit logs, voter override logs, forensic election data, and full 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports from the Florida Division of Elections (Exhibit B, Exhibit N), to confirm the protected voter manipulation which occurred, and the unauthorized VBM requests for Branden M. Vicari,

Jared Kahn, and Jeffrey Klein, because the Supervisor of Elections' obstruction (19,000-hour estimate, Exhibit N), prevents access to critical evidence.

5. Deny or vacate any orders sealing exhibits, as such actions obstruct public access to evidence of fraud (Exhibits B, E) and violate Fla. Stat. § 119.07.

6. Grant such other relief as this Court deems just and proper.

V. CERTIFICATE OF GOOD FAITH

I HEREBY CERTIFY that this motion is filed in good faith, based on newly discovered evidence (Exhibits A, B, C, E, F, G) and prior filings (Exhibits A-Q, EXHIBITS A_Q.pdf), and is not for purposes of delay.

VI. LIST OF EXHIBITS

1. **Exhibit A**: Marriage Record for Kelly Vicari: A copy of the marriage record from the Pinellas County Clerk of Court website, dated November 8, 2014 (I#: 2014315203, BK: 18589 PG: 976, recorded 11/13/2014), confirming that Kelly Vicari (formerly Kelly Lynn Lewis) is married to Branden M. Vicari. This record establishes Vicari's spousal connection to a protected voter whose unauthorized

VBM requests on June 23, 2024, and September 9, 2024, create a disqualifying conflict under Rule 4-1.7 and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), as detailed in ¶¶ 5, 9 of the motion.

2. **Exhibit B**: VBM Election Reports Naming Vicari's Husband, Kahn, and Klein: Excerpts from the 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports, obtained from the Florida Department of State, Division of Elections at

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports, pursuant to Florida Rule 1S-2.043, Rule 1S-2.055, and Fla. Stat. § 101.62. The reports, partially included due to ongoing production delays by the Supervisor of Elections (Exhibit N), are intended to show the unauthorized VBM requests for Branden M. Vicari, Jared Kahn, and Jeffrey Klein, on June 23, 2024, and September 9, 2024, flagged as "N/N" (no identification provided), violating Fla. Stat. § 101.62(1)(b). These requests, part of the 219,673 and 196,055 illegal VBM ballot requests, confirm the attorneys' status as material witnesses and/or victims, necessitating their disqualification under Rule 4-3.7 and Rule 4-1.10, as alleged in ¶¶ 1-5, 9. Full reports are requested per ¶ D.

3. **Exhibit C:** Screenshot of the lock placed on Protected Voters on Pinellas County Supervisor of Elections Website: A screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov), captured on April 11, 2025, by John Siamas using Zight Screen Capture (Exhibit G), showing how a protected voter cannot request a VBM ballot online VBM requests for protected voters, as mandated by Fla. Stat. § 97.0585 and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf). The screenshot displays a "*Protected*" status or error message, confirming that requests for Branden M. Vicari and Jared Kahn were technically impossible without fraud or manual override, all which support the fraud allegations and attorneys' conflicts in ¶¶ 2-4, 9.

4. **Exhibit D:** Affidavit of Christopher Gleason: An affidavit by Appellant Christopher Gleason, dated April 28, 2025, attesting to the acquisition and authenticity of Exhibits A, B, C, E, F, G, and their relevance to the alleged VBM fraud involving voters whose information is protected, including Branden M. Vicari, Jared Kahn, and Jeffrey Klein. The affidavit confirms the marriage record's link to Vicari, the VBM reports' evidence of unauthorized requests, the screenshot's demonstration of the restriction placed on protected

voters, the sealing of exhibits/court records as attempted obstruction, and the attorneys' roles, all which support the motion's claims in ¶¶ 1-9.

5. **Exhibit E:** County Attorneys' Drafted Order and Court Orders to Seal Exhibits: A copy of the County Attorneys' draft sealing order, dated September 20, 2024, attached to Jared Kahn's email (Exhibit E, Pages 21-22), and court orders by Judge Patricia Muscarella (Exhibit E, Pages 23-27), requesting and granting the sealing of all exhibits in Case No. 522024CA003995XXCICI, including public election records (Exhibit B). These actions violate F.S. § 119.07 by obstructing access to non-exempt records and demonstrate bad faith under F.S. § 111.07, as alleged in ¶¶ 6, 9, reinforcing the need for disqualification and the prohibition of public funds for Defendant's legal fees.

6. **Exhibit F:** Florida Bar Member Profiles for Kelly Vicari, Jared Kahn, and Jeffrey Klein: Screenshots from the Florida Bar website (https://www.floridabar.org), captured April 24, 2025, confirming Kelly Vicari (Bar #88704), Jared Kahn (Bar #105276), and Jeffrey Klein (Bar #1025117) as government attorneys at the Pinellas County Attorney's Office (315 Court St, Clearwater, FL). These

profiles verify their roles, practice areas (City/County/Local Government Law), and office size (21-50 attorneys), supporting their disqualification under Rule 4-1.7, Rule 4-3.7, and imputed disqualification under Rule 4-1.10, as alleged in ¶¶ 4-5, 9, 14.a-c.

7. **Exhibit G:** Affidavit of John Siamas: Affidavit of John Siamas, dated April 28, 2025, attesting to the capture of a screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov) on April 11, 2025, using Zight Screen Capture. The affidavit confirms the screenshot's authenticity, showing a '*Protected*' status error message blocking online VBM requests for protected voters, as mandated by Fla. Stat. § 97.0585, supporting fraud allegations and attorney conflicts in ¶¶ 2-4, 9.

Dated: April 28, 2025

Respectfully submitted,

/s/ Christopher Gleason

Christopher Gleason, Pro Se
2098 Seminole Blvd #62122
Largo, FL 33778
Phone: 727-480-2059
Email: gleasonforpinellas@gmail.com

I HEREBY CERTIFY that a true and correct copy of the foregoing, along with Exhibits A, B, C, D, E, F, G, was furnished via email and the Florida Courts E-Filing Portal on April 24, 2025, to:

Clerk of the Second District Court of Appeal

Julie Marcus, Supervisor of Elections, Pinellas County

Dustin Chase, Deputy Supervisor of Elections

Matt Smith, General Counsel, Supervisor of Elections

Bruce Bartlett, Pinellas County State Attorney

Kelly L. Vicari, Esq., Jared Kahn, Esq., Jeffrey Klein, Esq., Attorneys for Appellees

/s/ Christopher Gleason

IV. NOTARY ACKNOWLEDGMENT

[AFFIANT SIGNATURE]

Sworn to and subscribed before me by means of ✓ physical presence or ____ online notarization, this 28th day of April 2025, by CHRISTOPHER GLEASON.

Notary Public – State of Florida

Scott Suprenant

[PRINT, TYPE, OR STAMP NAME OF NOTARY PUBLIC]

SCOTT SUPRENANT
Notary Public
State of Florida
Comm# HH506057
Expires 7/14/2028

Personally Known ____ OR Produced Identification ✓ [CHECK ONE]

Exhibit A

Marriage Record for Kelly Vicari

A copy of the marriage record obtained directly from the Pinellas County Clerk of Court website, dated November 8, 2014, confirming that Kelly Vicari is married to Branden M. Vicari. The record is authentic and unaltered and recorded as I#:2014315203 BK: 18589 PG:976, 11/13/2014 at 02:15 PM by KEN BURKE. This record establishes Vicari's spousal connection to a protected voter whose unauthorized VBM requests on June 23, 2024, and September 9, 2024, create a disqualifying conflict under Rule 4-1.7 and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), as detailed in ¶¶ 5, 8 of the motion.

I#: 2014315203 BK: 18589 PG: 976, 11/13/2014 at 02:15 PM, RECORDING 1 KEN BURKE, CLERK OF COURT AND COMPTROLLER PINELLAS COUNTY, FL BY DEPUTY CLERK: CLKPR03

Department of Health • Vital Statistics

STATE OF FLORIDA
MARRIAGE RECORD

TYPE IN UPPER CASE
USE BLACK INK

This license not valid unless seal of Clerk, Circuit or County Court, appears thereon.

(STATE FILE NUMBER)

2014 ML 2891182
(APPLICATION NUMBER)

APPLICATION TO MARRY

1. GROOM'S NAME (First, Middle, Last)			2. DATE OF BIRTH (Month, Day, Year)
BRANDEN MICHAEL VICARI			12/09/1984
3a. RESIDENCE - CITY, TOWN, OR LOCATION	3b. COUNTY	3c. STATE	4. BIRTHPLACE (State or Foreign Country)
PALM HARBOR	PINELLAS	FL	NY
5a. BRIDES NAME (First, Middle, Last)	5b. MAIDEN SURNAME (If different)		6. DATE OF BIRTH (Month, Day, Year)
KELLY LYNN LEWIS	LEWIS		08/23/1986
7a. RESIDENCE - CITY, TOWN, OR LOCATION	7b. COUNTY	7c. STATE	8. Birthplace (State or Foreign Country)
PALM HARBOR	PINELLAS	FL	MI

WE THE APPLICANTS NAMED IN THIS CERTIFICATE, EACH FOR HIMSELF OR HERSELF, STATE THAT THE INFORMATION PROVIDED ON THIS RECORD IS CORRECT TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THAT NO LEGAL OBJECTION TO THE MARRIAGE NOR THE ISSUANCE OF A LICENSE TO AUTHORIZE THE SAME IS KNOWN TO US AND HEREBY APPLY FOR LICENSE TO MARRY.

9. SIGNATURE OF GROOM (Sign full name using black ink)	10. SUBSCRIBED AND SWORN TO BEFORE ME ON (DATE)
> [signature]	10/13/2014
11. TITLE OF OFFICIAL	12. SIGNATURE OF OFFICIAL (Use black ink)
DEPUTY CLERK	> [signature]
13. SIGNATURE OF BRIDE (Sign full name using black ink)	14. SUBSCRIBED AND SWORN TO BEFORE ME ON (DATE)
> [signature]	10/13/2014
15. TITLE OF OFFICIAL	16. SIGNATURE OF OFFICIAL (Use black ink)
DEPUTY CLERK	> [signature]

LICENSE TO MARRY

AUTHORIZATION AND LICENSE IS HEREBY GIVEN TO ANY PERSON DULY AUTHORIZED BY THE LAWS OF THE STATE OF FLORIDA TO PERFORM A MARRIAGE CEREMONY WITHIN THE STATE OF FLORIDA AND TO SOLEMNIZE THE MARRIAGE OF THE ABOVE NAMED PERSONS. THIS LICENSE MUST BE USED ON OR AFTER THE EFFECTIVE DATE AND ON OR BEFORE THE EXPIRATION DATE IN THE STATE OF FLORIDA IN ORDER TO BE RECORDED AND VALID.

17. COUNTY ISSUING LICENSE	18. DATE LICENSE ISSUED	18a. DATE LICENSE EFFECTIVE	19. EXPIRATION DATE
PINELLAS	10/13/2014	10/16/2014	12/15/2014

20a. SIGNATURE OF COURT CLERK OR JUDGE	20b. TITLE	20c. BY D.C.
> [signature]	CLERK OF THE CIRCUIT COURT AND COMPTROLLER	DLF

CERTIFICATE OF MARRIAGE

I HEREBY CERTIFY THAT THE ABOVE NAMED GROOM AND BRIDE WERE JOINED BY ME IN MARRIAGE IN ACCORDANCE WITH THE LAWS OF THE STATE OF FLORIDA.

21. DATE OF MARRIAGE (Month, Day, Year)	22. CITY, TOWN, OR LOCATION OF MARRIAGE
Nov. 8, 2014	TAMPA, FLORIDA
23a. SIGNATURE OF PERSON PERFORMING CEREMONY (Use black ink)	23c. ADDRESS (Of person performing ceremony)
> [signature]	2686 BAYSHORE BLVD. DUNEDIN, FL
23b. NAME AND TITLE OF PERSON PERFORMING CEREMONY (Or notary stamp)	24. SIGNATURE OF WITNESS TO CEREMONY (Use black ink)
REV. FR. JERRY J. RITTENHOUSE	> [signature]
	25. SIGNATURE OF WITNESS TO CEREMONY (Use black ink)
	> [signature]

Exhibit B:

VBM Election Reports Naming Vicari's Husband, Kahn, and Klein
Excerpts from the 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports, obtained from the Florida Department of State, Division of Elections at https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports, pursuant to Florida Rule 1S-2.043, Rule 1S-2.055, and F.S. § 101.62. The reports show unauthorized VBM requests for Branden M. Vicari, Jared Kahn, and Jeffrey Klein on June 23, 2024, and September 9, 2024, flagged as "N/N" (no identification verification), violating F.S. § 101.62(1)(b). These requests, part of 219,673 and 196,055 illegal requests, confirm the attorneys' status as material witnesses or victims, necessitating disqualification under Rule 4-3.7 and Rule 4-1.10, as alleged in ¶¶ 1-5, 8.

AUGUST 20, 2024 PRIMARY ELECTION

VOTE BY MAIL EARLY VOTING REPORT EXTRACT

NOVEMBER 2024 GENERAL ELECTION

VOTE BY MAIL EARLY VOTING REPORT EXTRACT

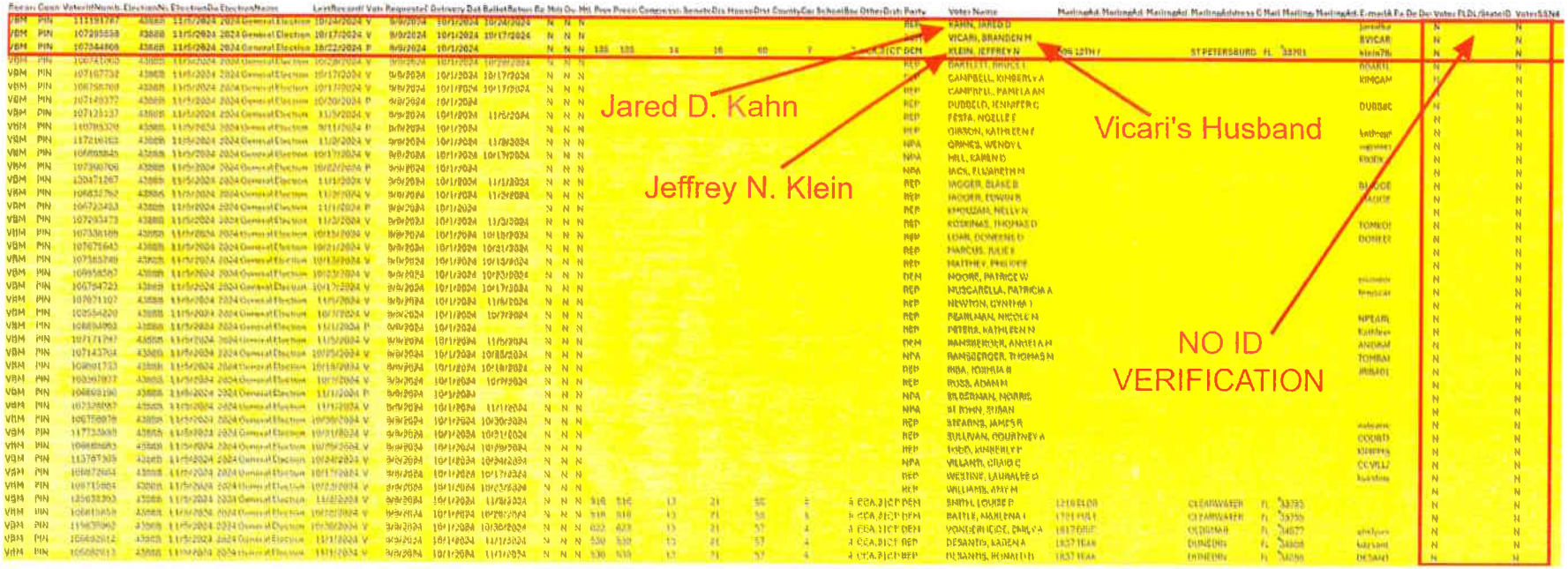


Exhibit C:

Screenshot of Protected Voter Lock on Pinellas County Supervisor of Elections Website
A screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov), captured on April 10, 2025, showing the protected voter lock mechanism that blocks online VBM requests for protected voters, as mandated by F.S. § 97.0585 and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf). The screenshot displays a "Protected" status or error message, confirming that requests for Branden M. Vicari, Kahn, and Klein were technically impossible without fraud or manual override, supporting the fraud allegations and attorneys' conflicts in ¶¶ 2-4, 8.

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Protected Voter Message

Select Language

Powered by Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Exhibit D:

Affidavit of Christopher Gleason
An affidavit by Appellant Christopher Gleason, dated April 24, 2025, attesting to the acquisition and authenticity of Exhibits A, B, C, and E, and their relevance to the alleged VBM fraud involving protected voters Branden M. Vicari, Jared Kahn, and Jeffrey Klein. The affidavit confirms the marriage record's link to Vicari, the VBM reports' evidence of unauthorized requests, the screenshot's demonstration of protected voter restrictions, and the sealing attempt's obstruction, supporting the motion's claims in ¶¶ 1-8.

STATE OF FLORIDA
COUNTY OF PINELLAS

AFFIDAVIT OF CHRISTOPHER GLEASON REGARDING AMENDED AND SUPPLEMENTED MOTION TO DISQUALIFY COUNTY ATTORNEYS AND BAR USE OF TAXPAYER FUNDS FOR DEFENSE

BEFORE ME, the undersigned authority, personally appeared Christopher Gleason, who, being duly sworn, deposes and says:

1. I am the Appellant/Petitioner in Case Nos. 2D2024-2687 and 2D2024-2688, pending in the Second District Court of Appeal of Florida, and the Plaintiff in the lower court proceedings, Case Nos. 522024CA003717XXCICI and 522024CA003995XXCICI, in the Circuit Court of the Sixth Judicial Circuit, Pinellas County, Florida. I am over 18 years of age, competent to testify, and have personal knowledge of the facts stated herein.

2. I submit this affidavit in support of my Amended and Supplemented Motion to Disqualify County Attorneys and Bar Use of Taxpayer Funds for Defense, filed in the above-captioned cases, to attest to the acquisition, authenticity, and

relevance of Exhibits A, B, C, and E, which demonstrate conflicts of interest, ethical violations, and systemic vote-by-mail (VBM) fraud involving protected voters Branden M. Vicari, Jared Kahn, and Jeffrey Klein, as alleged in paragraphs 1-8 of the motion.

3. **Exhibit A: Marriage Record for Kelly Vicari**

On 04/24/2025, I obtained a copy of the marriage record for Kelly Vicari formerly Kelly Lynn Lewis, from the Pinellas County Clerk of Court website, confirming that she is married to Branden Michael Vicari. The record is authentic and unaltered and recorded as I#:2014315203 BK: 18589 PG:976, 11/13/2014 at 02:15 PM by KEN BURKE. This exhibit establishes Vicari's spousal connection to a protected voter whose unauthorized VBM requests on June 23, 2024, and September 9, 2024, create a disqualifying conflict of interest under Rule 4-1.7, Florida Rules of Professional Conduct, and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), as detailed in paragraphs 5 and 8 of the motion.

4. **Exhibit B: VBM Election Reports Naming Vicari's Husband, Branden M. Vicari, Kahn, and Klein**

I personally accessed and downloaded excerpts from the 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports from the Florida Department of State, Division of Elections, at https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports, pursuant to Florida Rule 1S-2.043, Rule 1S-2.055, and F.S. § 101.62. These reports are authentic official election records and public records showing unauthorized VBM requests for Branden M. Vicari, Jared Kahn, and Jeffrey Klein on June 23, 2024, and September 9, 2024, flagged as "N/N" (no identification verification), in violation of F.S. § 101.62(1)(b). The requests, part of 219,673 and 196,055 illegal requests, confirm the attorneys' status as material witnesses or victims, necessitating disqualification under Rule 4-3.7 and Rule 4-1.10, as alleged in paragraphs 1-5 and 8 of the motion.

5. **Exhibit C: Screenshot of Protected Voter Lock on Pinellas County Supervisor of Elections Website**

On or about April 10, 2025 I was with John Siamus who captured a screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov) using Zight Screen Capture. The screenshot is authentic, unaltered. It displays the protected voter lock mechanism, showing a "Protected" status or error message that blocks online VBM requests for protected voters, as mandated by F.S. § 97.0585 and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf). This exhibit confirms that VBM requests for Branden M. Vicari, and Jared D. Kahn, and Klein were technically impossible without fraud or manual override, supporting the fraud allegations and attorneys' conflicts in paragraphs 2-4 and 8 of the motion.

6. **Exhibit E: County Attorneys' Motion to Seal Exhibits**

On 04/24/2025, I obtained a copy of the court order drafted by County Attorneys, dated [Insert Date of Motion], requesting to seal all exhibits in Case Nos. 522024CA003995XXCICI,

including public VBM reports (Exhibit B). The document is authentic, as obtained from [Specify Source, e.g., court docket, opposing counsel]. The sealing attempt violates F.S. § 119.07 by obstructing access to non-exempt records and demonstrates bad faith under F.S. § 111.07, as it seeks to conceal evidence of fraud implicating the attorneys, Branden M. Vicari, and judicial officers (Exhibit O, EXHIBITS A_Q.pdf), as alleged in paragraphs 6 and 8 of the motion.

7. The above exhibits are directly relevant to the motion's claims:

   a. Exhibit A confirms Vicari's personal conflict via her husband's involvement, supporting disqualification (¶ 5).

   b. Exhibit B establishes Jared D. Kahn, Jeffrey N. Klein, and Branden M. Vicari as witnesses or victims of VBM fraud, triggering Rule 4-3.7 and Rule 4-1.10 (¶¶ 1-5).

   c. Exhibit C proves the technical impossibility of the VBM requests, evidencing fraud and systemic misconduct (¶¶ 2-4, 8).

d. Exhibit E demonstrates the County Attorneys' bad faith and obstruction, justifying the bar on public funding and referral to the Florida Bar (¶¶ 6, 8).

8. The facts stated herein are true to the best of my knowledge and belief. I have not altered or misrepresented any exhibit, and I obtained them through lawful means as described. The exhibits support the motion's allegations of conflicts of interest, ethical violations, unlawful public expenditures, and a systemic cascade conflict violating due process, as detailed in paragraphs 1-8.

FURTHER AFFIANT SAYETH NAUGHT.

Dated: April 28, 2025

/s/ Christopher Gleason

Christopher Gleason
2098 Seminole Blvd #6212
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com, gleasonforpinellas@gmail.com

STATE OF FLORIDA
COUNTY OF PINELLAS

Sworn to and subscribed before me this 28th day of April, 2025, by Christopher Gleason, who is personally known to me (or who produced identification:

Notary Public, State of Florida
Name: Scott Suprenant
Commission No.: HH506057
My Commission Expires: July 14, 2028
[Notary Seal]

SCOTT SUPRENANT
Notary Public
State of Florida
Comm# HH506057
Expires 7/14/2028

Exhibit E:

County Attorneys' Drafted Order to Seal Exhibits

A copy of the County Attorneys' draft of the sealing order, dated September 20, 2024, requesting to seal all exhibits in Case Nos. 522024CA003995XXCICI, including public election records (Exhibit B). This action violates F.S. § 119.07 by obstructing access to non-exempt records and demonstrates bad faith under F.S. § 111.07, as alleged in ¶¶ 6, 8, reinforcing the need for disqualification and barring public funding.

Gmail Christopher Gleason <gleasonforpinellas@gmail.com>

Proposed Order - Christopher Gleason v. Julie Marcus, et al. 24-003995-C

Kahn, Jared D <jkahn@pinellas.gov> Fri, Sep 20, 2024 at 8:28 AM
To: Christopher Gleason <gleasonforpinellas@gmail.com>
Cc: "immutabletruth@protonmail.com" <immutabletruth@protonmail.com>, Christopher Gleason <cpgleason72@gmail.com>, "Klein, Jeffrey" <jklein@pinellas.gov>, "Vicari, Kelly L" <kvicari@pinellas.gov>, "Curtis, Michelle M" <mmcurtis@pinellas.gov>, "Noe, Barbara" <banoe@pinellas.gov>

Mr Gleason,

I will submit the proposed order this morning noting your objection.

Have a blessed day,

Jared Kahn

On Sep 20, 2024, at 7:58 AM, Christopher Gleason <gleasonforpinellas@gmail.com> wrote:

I definitely object, you are asking to seal all exhibits. That was not even discussed or brought before the court. Your motion was to seal Exhibit G.

On Thu, Sep 19, 2024 at 5:19 PM Kahn, Jared D <jkahn@pinellas.gov> wrote:

Mr. Gleason,

Please see proposed order in Christopher Gleason v. Julie Marcus, et al. 24-003995-CI; GRANTING without prejudice DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS and GRANTING without prejudice DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION.

Please let me know if you have any objections or suggested edits. I will plan to upload this order tomorrow 9/20/24 morning around 11AM if I do not hear from you first.

Have a nice evening,

Jared D. Kahn

Senior Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, 6th Floor

Clearwater, FL 33756

Phone: (727) 464-3354

Fax: (727) 464-4147

jkahn@pinellas.gov

All government correspondence is subject to the public records law.

image001.png
35K

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON, Candidate for Supervisor of Elections, Pinellas County, Elector, Citizen, and Taxpayer,

Plaintiff,

v.

Case No.: 24-003995-CI
UCN: 522024CA003995XXCICI

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et al.,

Defendants.

_____/

ORDER GRANTING DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND GRANTING DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION

THIS MATTER came before this Court on September 19, 2024, on DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION, having considered the Motions, the case file, the applicable law, and otherwise fully advised in the premises, the Court hereby **ORDERS and ADJUDGES** that DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS is hereby **GRANTED without prejudice** and DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF

RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION is hereby **GRANTED without prejudice.**

The Pinellas County Clerk of the Circuit Court is directed to maintain all exhibits filed by Plaintiff as Protected/Confidential/Sensitive until further order of the court.

Plaintiff has until **September 19th, 2024,** to respond to DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS.

Plaintiff has until **September 23rd, 2024,** to re-file exhibits with Protected/Confidential/Sensitive data redacted or, in the alternative, file a response in opposition to DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTIVE AND JUDICIAL ADMINISTRATION stating the reason Protected/Confidential/Sensitive should not be protected.

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida this ____ day of September 2024. A true and correct copy of the forgoing has been furnished to all parties listed below.

Judge Patricia Muscarella

cc: all parties

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON, Candidate for Supervisor of Elections, Pinellas County, Elector, Citizen, and Taxpayer,

Plaintiff,

v.

Case No.: 24-003995-CI
UCN: 522024CA003995XXCICI

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et al.,

Defendants.

_____/

ORDER GRANTING DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND GRANTING DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION

THIS MATTER came before this Court on September 19, 2024, on DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION, having considered the Motions, the case file, the applicable law, and otherwise fully advised in the premises, the Court hereby **ORDERS and ADJUDGES** that DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS is hereby **GRANTED without prejudice** and DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425,

FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION is hereby **GRANTED without prejudice.**

The Pinellas County Clerk of the Circuit Court is directed to maintain all exhibits filed by Plaintiff as Protected/Confidential/Sensitive until further order of the court.

Plaintiff represented to the Court that he would respond in writing with his opposition to Defendant's motions as to Exhibit G by close of business on September 19th, 2024. Although not received until the morning of September 20th, 2024, the Court nonetheless deems Plaintiff's opposition timely. Defendant shall have until **September 27th, 2024** to serve a reply, if any, to Plaintiff's opposition.

Plaintiff has until **September 23rd, 2024,** to re-file the additional exhibits with Protected/Confidential/Sensitive data redacted or, in the alternative, file a response in opposition to DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION stating his basis or claim of exemption for the inapplicability of Protected/Confidential/Sensitive status as to the exhibits in question.

The parties may renew argument on Defendant's Motions and any related filings at the Case Management Conference scheduled in this matter on **October 1, 2024 at 12:00 P.M.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida this ____ day of September 2024. A true and correct copy of the forgoing has been furnished to all parties listed below.

Circuit Judge Patricia A. Muscarella
24-003995-CI 9/20/2024 3:52:08 PM

Judge Patricia Muscarella

Exhibit F:

Florida Bar Member Profiles for Kelly Vicari, Jared Kahn, and Jeffrey Klein

Screenshots from the Florida Bar website (https://www.floridabar.org), captured April 24, 2025, confirming Kelly Vicari (Bar #88704), Jared Kahn (Bar #105276), and Jeffrey Klein (Bar #1025117) as government attorneys at the Pinellas County Attorney's Office (315 Court St, Clearwater, FL). These profiles verify their roles, practice areas (City/County/Local Government Law), and office size (21-50 attorneys), supporting disqualification under Rule 4-1.7, Rule 4-3.7, and imputed disqualification under Rule 4-1.10, as alleged in ¶¶ 4-5, 9, 14.a-c.

MEMBER PROFILE

Kelly Lynn Vicari

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:

88704

Mail Address:

Pinellas County Attorney's Office
315 Court St
Clearwater, FL 33756-5165

Office: **727-464-3354**

Cell: **727-464-3354** - No Text Messages

Email:

kvicari@pinellascounty.org

Personal Bar URL:

https://www.floridabar.org/mybarprofile/88704

vCard:

County:

Pinellas

Circuit:

06

Admitted:

04/14/2011

10-Year Discipline History:

None

Law School:

Florida Coastal School of Law, 2010

Board Certifications:

Area	Year
City, County and Local Government Law	2019

Sections:

City, County & Local Govt Law

Practice Areas:

City/County/Local Government

Civil Litigation

Workers' Compensation/Defense

Federal Courts:

Florida Middle District Bankruptcy Court

U.S. District Court, Middle District of Florida

U.S. District Court, Northern District of Florida

Firm Position:

Government attorney

The Find a Lawyer directory is provided as a public service. The Florida Bar maintains limited basic information about lawyers licensed to practice in the state (e.g., name, address, year of birth, gender, law schools attended, admission year). However, The Florida Bar allows individual attorneys the opportunity to add personal and professional information to the directory. The lawyer is solely responsible for reviewing and updating any additional information in the directory. The lawyer's added information is not reviewed by The Bar for accuracy and The Bar makes no warranty of any kind, express or implied. The Florida Bar, its Board of Governors, employees, and agents are not responsible for the accuracy of that additional information. Publication of lawyers' contact information in this listing does not mean the lawyers have agreed to receive unsolicited communications in any form. Unauthorized use of this data may result in civil or criminal penalties. The Find a Lawyer directory is not a lawyer referral service.

MEMBER PROFILE

Jared Douglas Kahn

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:

105276

Mail Address:

Pinellas County Attorney's Office
315 Court St
Clearwater, FL 33756-5165

Office: **727-464-3354**

Email:

jkahn@pinellas.gov

Personal Bar URL:

https://www.floridabar.org/mybarprofile/105276

vCard:

County:

Pinellas

Circuit:

06

Admitted:

09/27/2013

10-Year Discipline History:

None

Law School:

John Marshall Law School

Sections:

City, County & Local Govt Law

Trial Lawyers

Practice Areas:

City/County/Local Government

Civil Trial

Criminal

Trial

Federal Courts:

U.S. Court of Appeals for the Eleventh Circuit

U.S. District Court, Middle District of Florida

U.S. District Court, Northern District of Florida

U.S. District Court, Southern District of Florida

State Courts:

District Of Columbia

Firm:

Pinellas County Attorney's Office

Firm Size:

21-50

Firm Position:

Government attorney

The Find a Lawyer directory is provided as a public service. The Florida Bar maintains limited basic information about lawyers licensed to practice in the state (e.g., name, address, year of birth, gender, law schools attended, admission year). However, The Florida Bar allows individual attorneys the opportunity to add personal and professional information to the directory. The lawyer is solely responsible for reviewing and updating any additional information in the directory. The lawyer's added information is not reviewed by The Bar for accuracy and The Bar makes no warranty of any kind, express or implied. The Florida Bar, its Board of Governors, employees, and agents are not responsible for the accuracy of that additional information. Publication of lawyers' contact information in this listing does not mean the lawyers have agreed to receive unsolicited communications in any form. Unauthorized use of this data may result in civil or criminal penalties. The Find a Lawyer directory is not a lawyer referral service.

MEMBER PROFILE

Jeffrey Nathaniel Klein

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:

1025117

Mail Address:

Pinellas County Attorney's Office
315 Court St Fl 6
Clearwater, FL 33756-5165

Office: **727-464-3354**

Email:

jklein@pinellascounty.org

Personal Bar URL:

https://www.floridabar.org/mybarprofile/1025117

vCard:

County:

Pinellas

Circuit:

06

Admitted:

11/23/2020

10-Year Discipline History:

None

Sections:

City, County & Local Govt Law

Young Lawyers

Firm:

Pinellas County Attorney's Office

Firm Position:

Government attorney

The Find a Lawyer directory is provided as a public service. The Florida Bar maintains limited basic information about lawyers licensed to practice in the state (e.g., name, address, year of birth, gender, law schools attended, admission year). However, The Florida Bar allows individual attorneys the opportunity to add personal and professional information to the directory. The lawyer is solely responsible for reviewing and updating any additional information in the directory. The lawyer's added information is not reviewed by The Bar for accuracy and The Bar makes no warranty

Exhibit G:

Affidavit of John Siamus

Affidavit of John Siamus, dated April 24, 2025, attesting to the capture of a screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov) on April 10, 2025, using Zight Screen Capture. The affidavit confirms the screenshot's authenticity, showing a 'Protected' status or error message blocking online VBM requests for protected voters, as mandated by F.S. § 97.0585, supporting fraud allegations and attorney conflicts in ¶¶ 2-4, 9.

AFFIDAVIT OF JOHN SIAMASDETAILING THE EVENTS OF REQUESTING A VOTE-BY-MAIL-BALLOT AS A PROTECTED VOTER

STATE OF FLORIDA)

) ss:

COUNTY OF PINELLAS)

Before me, the undersigned authority, personally appeared JOHN SIAMAS, who, being duly sworn, states as follows:

AFFIANT IDENTITY

1. I, John Siamas, was a Republican candidate for the Florida State Sente District 21 Primary Election held on August 20th, 2024. I am over 18 and competent to make this affidavit and have personal knowledge of the facts stated herein.

PURPOSE OF AFFIDAVIT

2. This affidavit is made to establish the process I underwent requesting a Mail Ballot from the Pinellas County Supervisor of Elections as a "Protected Voter" on April 11, 2025 at 12:17 p.m.

MAIL BALLOT REQUEST FROM THE PINELLAS COUNTY SUPERVISOR OF ELECTIONS OFFICE

3. On April 11, 2025, at 12:17 p.m., I accessed the Pinellas County Supervisor of Elections website (*votepinellas.gov*) to request a mail ballot. I took screenshots of the entire process and have included them as **Exhibit 1**.

4. After entering all the requested information, I received a message which stated "The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

5. I then proceeded to call the Supervisor of Elections in Pinellas County as instructed in the message I received, at 12:20 p.m.

6. I spoke with a Supervisor of Elections Representative who stated that protected voters cannot request their Mail Ballot online. He then stated he could process my Mail Ballor request over the phone and proceeded to request some information in order to process the Mail Ballot request.

7. The information requested included my name, address, date of birth, and the last 4 of my SSN. I was not instructed to fill out any forms or provide any additional details to process the Mail Ballot request. I transcribed the full conversation with the Supervisor of Election Representative I had on April 11, 2025 (see **Exhibit 2**).

4. All of the records attached to this affidavit are true and correct copies of documents created at or near the time of the described events.

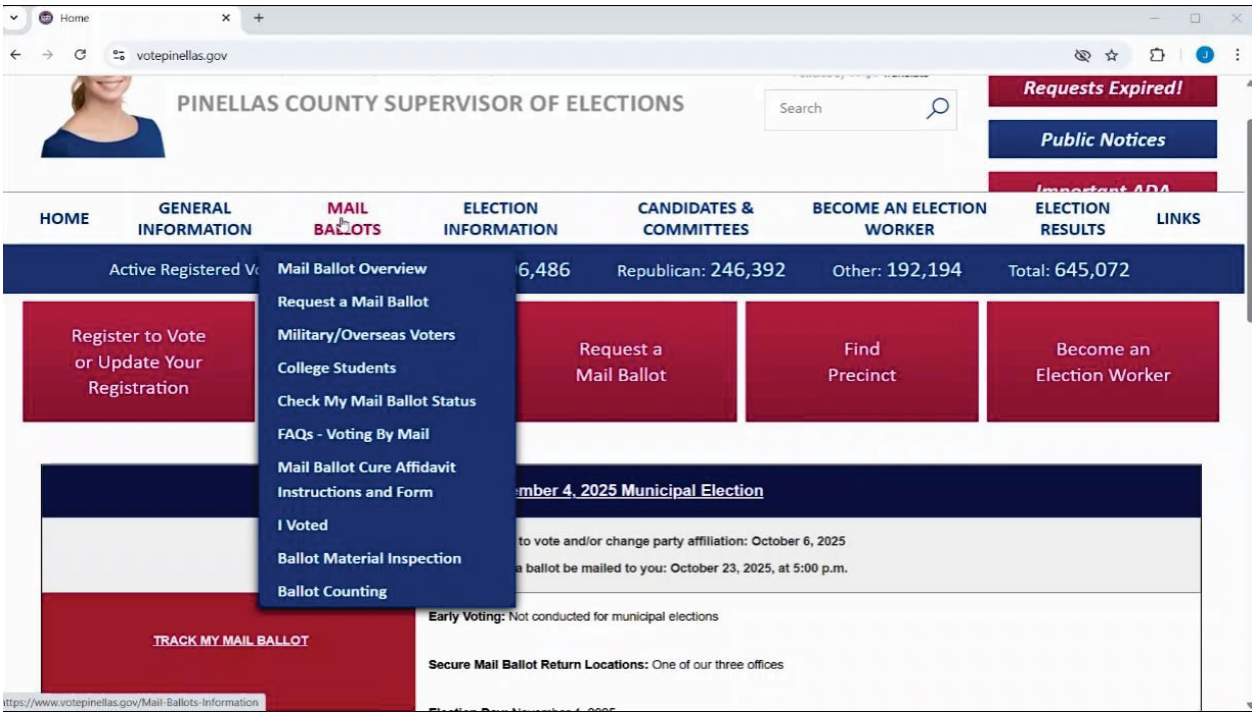
LIST OF EXHIBITS

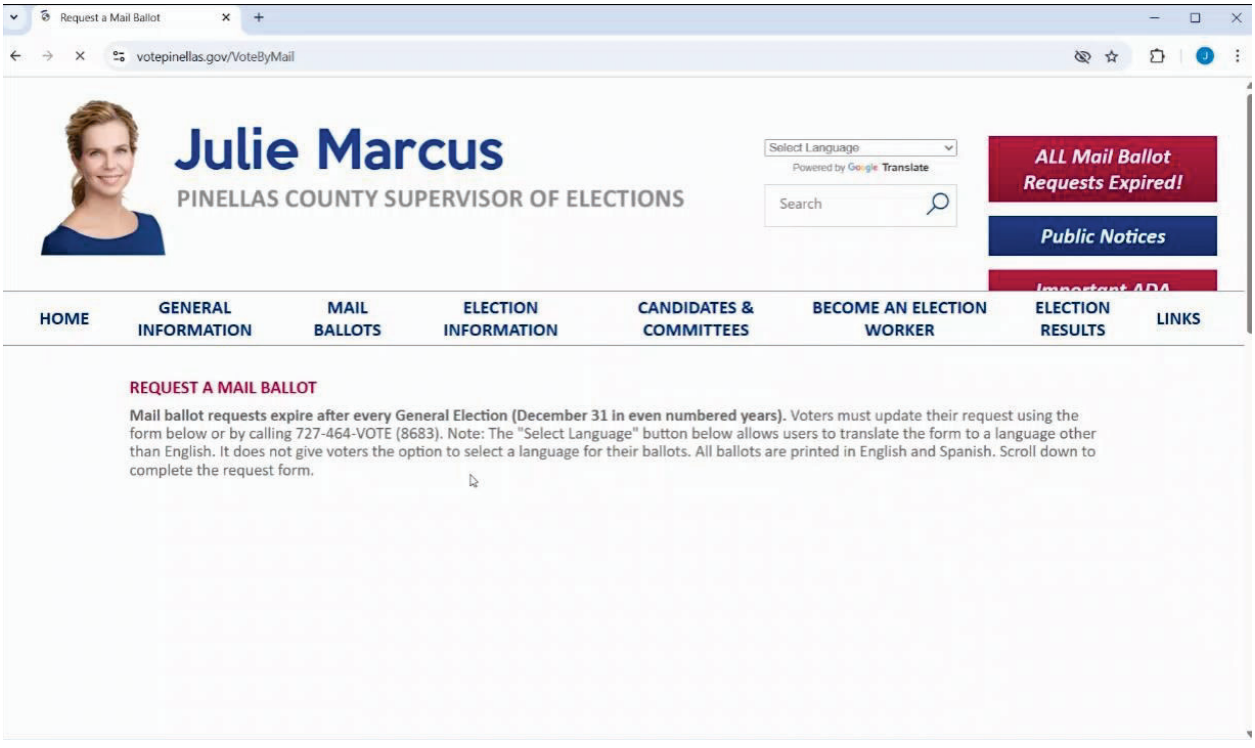
1. **Exhibit 1**: Screenshots of online Mail Ballot Request from the website of the Pinellas County Supervisor of Election website, *votepinellas.gov.*

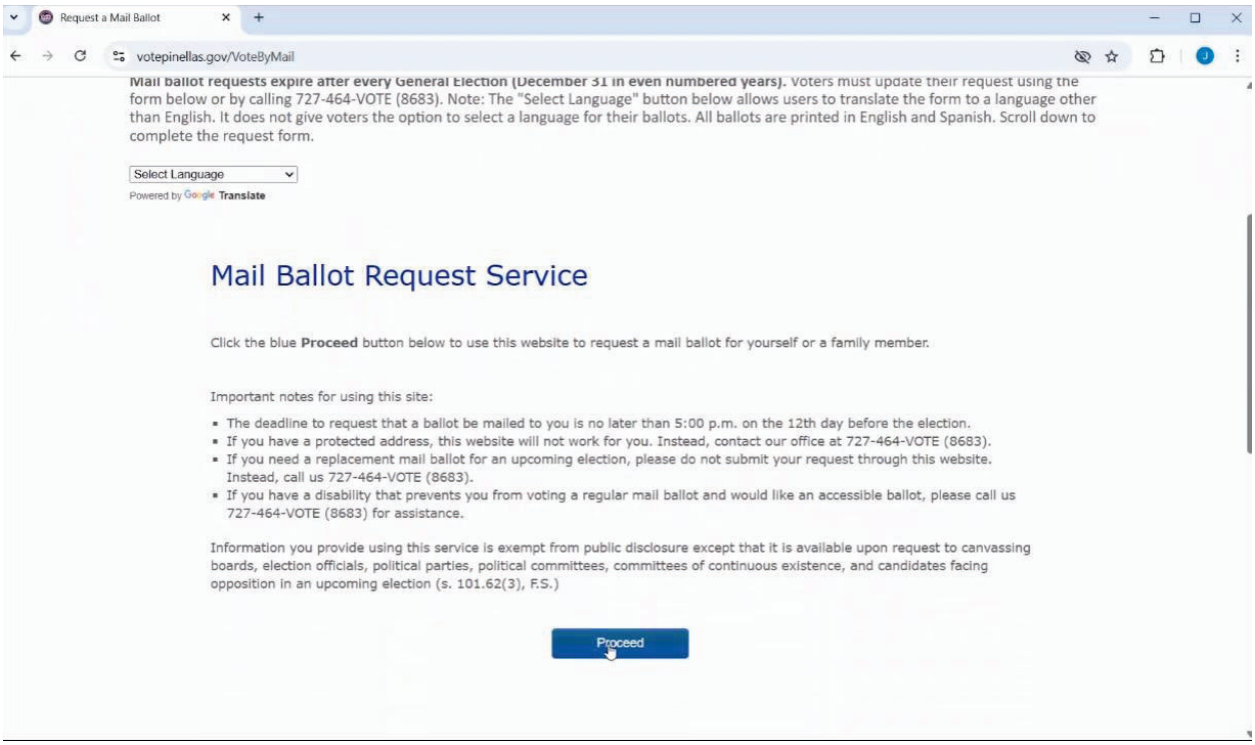
2. **Exhibit 2**: Transcription of Conversation with the Pinellas County Supervisor of Election Representative requesting a Mail Ballot on April 11, 2025, 12:20 p.m.

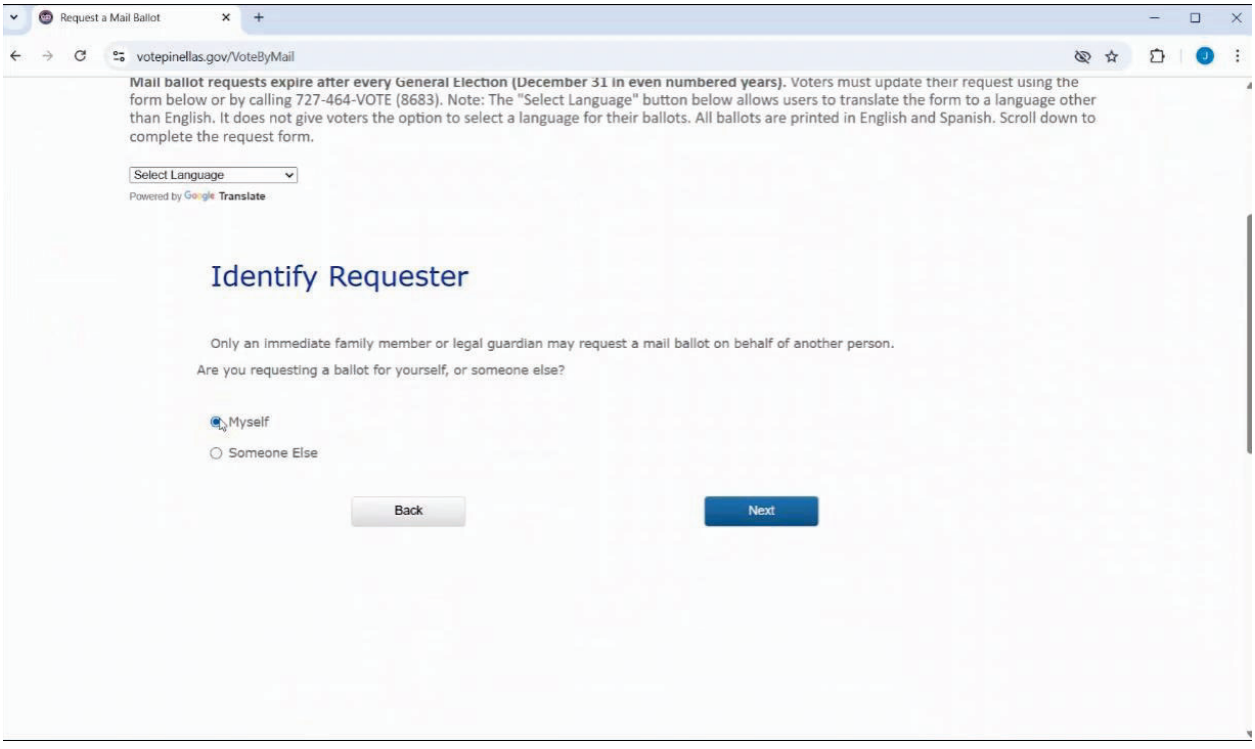
Exhibit 1

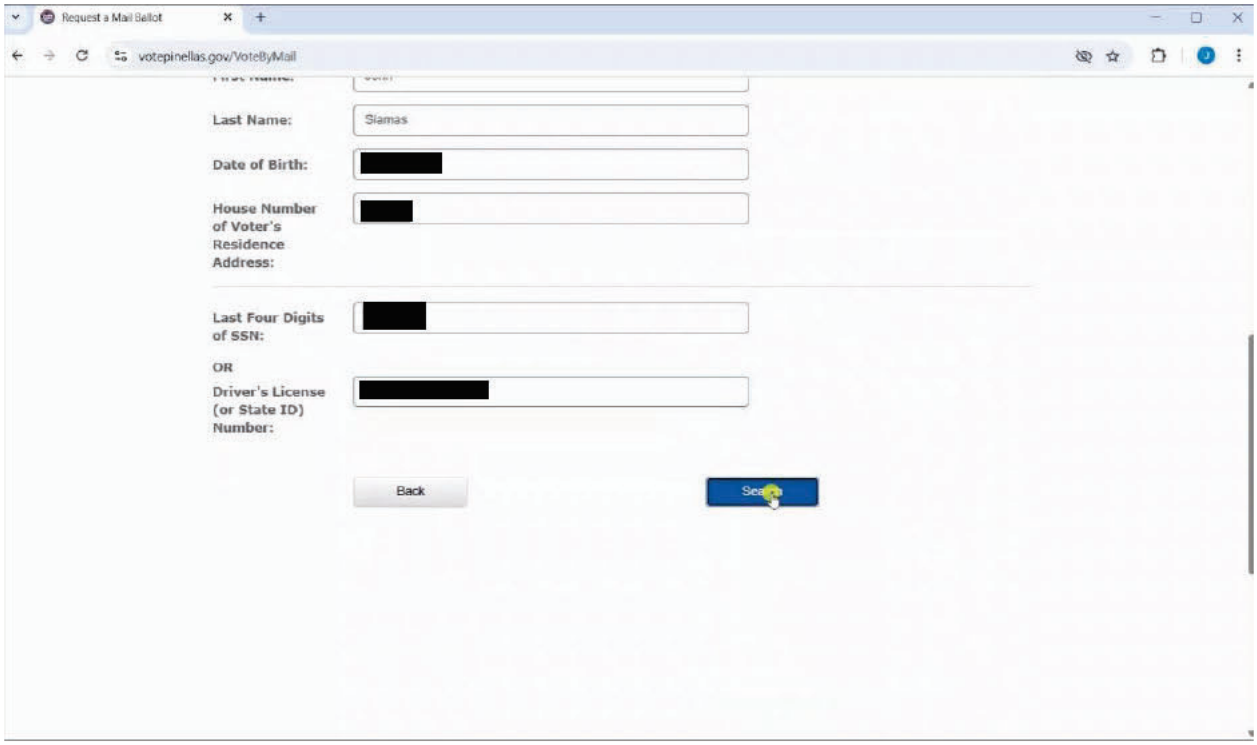
Screenshots of online Mail Ballot Request from the website of the Pinellas County Supervisor of Election website, *votepinellas.gov.*




votepinellas.gov/VoteByMail
Julie Marcus
PINELLAS COUNTY SUPERVISOR OF ELECTIONS
Select Language
Powered by Google Translate
Search
ALL Mail Ballot Requests Expired!
Public Notices
HOME
GENERAL INFORMATION
MAIL BALLOTS
ELECTION INFORMATION
CANDIDATES & COMMITTEES
BECOME AN ELECTION WORKER
ELECTION RESULTS
LINKS
REQUEST A MAIL BALLOT
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.


Request a Mail Ballot
votepinellas.gov/VoteByMail
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Mail Ballot Request Service
Click the blue Proceed button below to use this website to request a mail ballot for yourself or a family member.
Important notes for using this site:
The deadline to request that a ballot be mailed to you is no later than 5:00 p.m. on the 12th day before the election.
If you have a protected address, this website will not work for you. Instead, contact our office at 727-464-VOTE (8683).
If you need a replacement mail ballot for an upcoming election, please do not submit your request through this website. Instead, call us 727-464-VOTE (8683).
If you have a disability that prevents you from voting a regular mail ballot and would like an accessible ballot, please call us 727-464-VOTE (8683) for assistance.
Information you provide using this service is exempt from public disclosure except that it is available upon request to canvassing boards, election officials, political parties, political committees, committees of continuous existence, and candidates facing opposition in an upcoming election (s. 101.62(3), F.S.)
Proceed


Request a Mail Ballot
votepinellas.gov/VoteByMail
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Identify Requester
Only an immediate family member or legal guardian may request a mail ballot on behalf of another person.
Are you requesting a ballot for yourself, or someone else?
Myself
Someone Else
Back
Next


Request a Mail Ballot
votepinellas.gov/VoteByMail
Last Name:
Siamas
Date of Birth:
House Number of Voter's Residence Address:
Last Four Digits of SSN:
OR
Driver's License (or State ID) Number:
Back

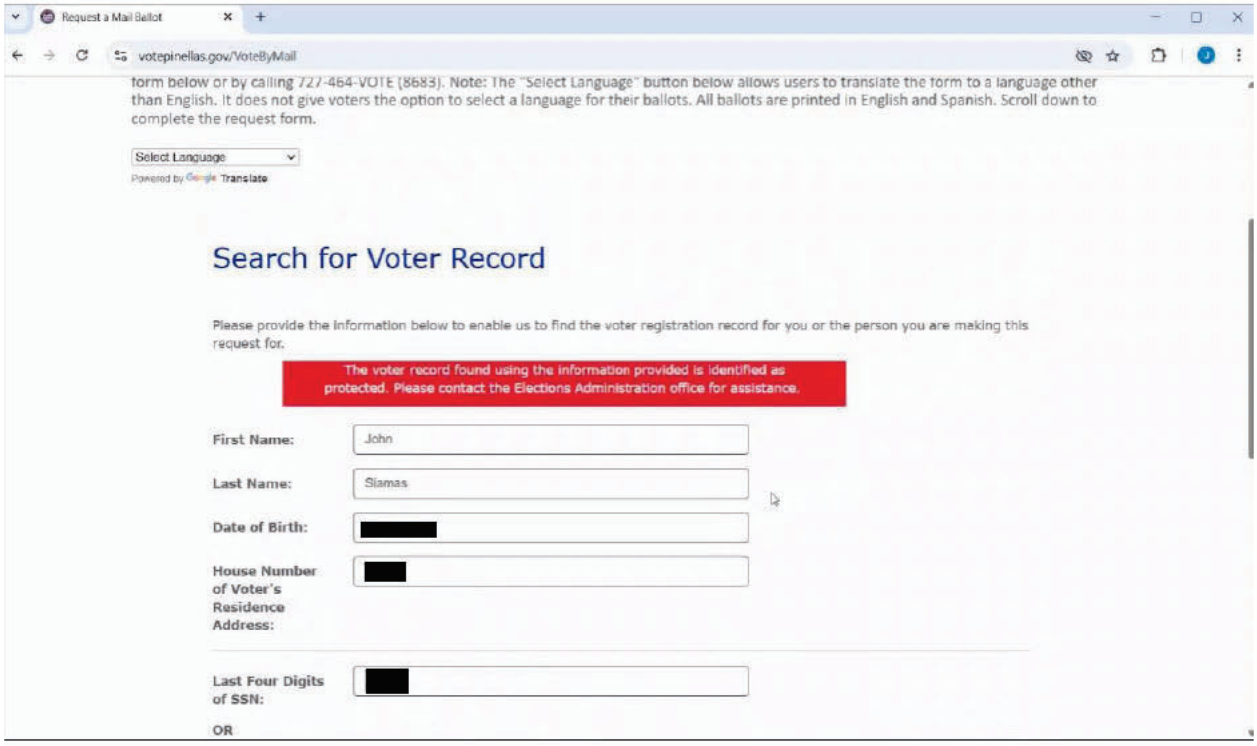

Request a Mail Ballot
votepinellas.gov/VoteByMail
form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Search for Voter Record
Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.
The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.
First Name:
John
Last Name:
Siamas
Date of Birth:
House Number of Voter's Residence Address:
Last Four Digits of SSN:
OR

Exhibit 2

Transcription of Conversation with the Pinellas County Supervisor of Election Representative requesting a Mail Ballot on April 11, 2025, 12:20 p.m.

Siamas: Hi good morning, I just tried to apply for my mail ballot, and I guess, not I guess I'm protected so there was a message that said I need to contact the elections administration office for assistance.

Supervisor of Elections Representative: Yea so if it's protected it's not going to allow, I'll do it over the phone.

Siamas: Oh ok so is that what happens, I can't do it online anymore because it's protected?

Supervisor of Elections Representative: Um yea I mean I've found that, I don't know how long it's been like that but yea you call in cause it's a protected address.

Siamas: Ok I'm just curious because I just recently became, You know I just recently submitted my paperwork to.

Supervisor of Elections Representative: Yea so we can do it over the phone.

Siamas: Ok is that cause it said elections administration office, I got a little confused I didn't know whether that is your office or another office.

Supervisor of Elections Representative: Yea it's the Supervisor of Elections Office.

Siamas: Ok, ok fantastic, yea just let me know what's next, I'm sorry.

Supervisor of Elections Representative: I just need your, just need your last name and your date of birth to get started.

Siamas: Ok so it's S-I-A-M-A-S.

Supervisor of Elections Representative: What's your date of birth?

Siamas: [redacted]

Supervisor of Elections Representative: Ok just give me a second.

Siamas: Actually this might apply to my spouse as well I'm assuming right? Because she, they would be included so, she hasn't tried yet but um, but I guess it would be the same process right?

Supervisor of Elections Representative: Um yes it's protected. Last four of

your social to verify the record please.

Siamas: Sure [redacted]

Supervisor of Elections Representative: Ok, and verify your address please.

Siamas: Yea its [redacted]

[redacted] Let me get my, do you need my driver's license?

Supervisor of Elections Representative: Uh, no Sir.

Siamas: Ok

Supervisor of Elections Representative: Give me a second here while I verify your record.

Siamas: Do you know why that is when you are protected, uh you gotta go through this process?

Supervisor of Elections Representative: I don't know why, I do know if somebody didn't have, you have one or the other you have your DL or the last four of your Social and you enter one or the other.

Siamas: Oh, I entered both is that why its coming up.

Supervisor of Elections Representative: No

Siamas: Oh ok ok, I thought I maybe screwed up when I was entering the data.

Supervisor of Elections Representative: Alright so, so your record is updated and it's good until December 31, 2026, so it's all this year and next year, um you are in a county not in a municipality so.

Siamas: Correct.

Supervisor of Elections Representative: So you have nothing scheduled for this year unless we have a special election then you will receive a mail ballot, other than that next year.

Siamas: Ok so I'm good to go when, um.

Supervisor of Elections Representative: You are good to go all the way to next year.

Siamas: So I'll get it in the mail right, I don't have to worry about that or

anything?

Supervisor of Elections Representative: Right, right you'll get it, if for some reason you don't, you can always call or go online to see the status of it.

Siamas: Oh, can I check the status?

Supervisor of Elections Representative: I don't know if you are protected, I don't have that answer.

Siamas: Ok got it, well I'll give it a shot after a couple days, after it gets into the system I guess, I didn't even know you can do that.

Supervisor of Elections Representative: Yea you can check your status, and if you pull that up during an election you can pull that up and it will tell you where your ballot is, when its been mailed, if its been counted, you know that whole process.

Siamas: Gotcha, ok yea I haven't even been in this ballot status thing, I didn't even know it exists to be honest with you, yea I don't expect it to be updated right away so um, I'll um, I'll take a look in.. This is interesting, not that I'm questioning it, I'm just, its interesting how it um, and it's good, I'm very happy that the protected has to go through a um different process.

Supervisor of Elections Representative: My guess is you can't pull up your information since it is protected, also if there is a record request it is protected so a third party could not get that information cause it is protected so that's the whole thing.

Siamas: ok, um fantastic, well thank you so much for your help I um really appreciate it

Supervisor of Elections Representative: Alright have a good

Siamas: Thank you bye bye.

[AFFIANT SIGNATURE]

Sworn to and subscribed before me by means of ✓ physical presence or _____ online notarization, this 28th day of April 2025, by JOHN SIAMAS.

Notary Public – State of Florida

Eliana Pimentel

ELIANA PIMENTEL
Notary Public - State of Florida
Commission # HH 496125
My Comm. Expires May 9, 2028

Personally Known _____ OR Produced Identification ✓

Type of Identification Produced: Drivers License

Tab Q – Protected Voter Logs: Official DOS records showing Sunday June 23, 2024 & Sept. 9, 2024 fraudulent requests.

Tab R – Administrative Orders and Clerk Emails: Evidence of improper case assignments and concealment.

EXHIBIT A:

Admin. Order 2024-003 PA/PI-CIR

BURKE, CLERK OF COURT AND COMPTROLLER PINELLAS COUNTY, FL BY DEPUTY CLERK: CLKPR04

IN THE CIRCUIT COURT, SIXTH JUDICIAL CIRCUIT
IN AND FOR PASCO AND PINELLAS COUNTIES, FLORIDA

ADMINISTRATIVE ORDER NO. 2024-003 PA/PI-CIR

RE: TEMPORARY ASSIGNMENTS FOR ELECTION-RELATED CASES

Florida Rule of General Practice and Judicial Administration 2.215(b)(3) states the Chief Judge shall consider available resources to ensure the efficient and proper administration of all courts within the circuit. Legal challenges to local, state, and national elections which are filed on the date of the election require expedited review. Lawsuits may be filed after hours when the Pasco County Clerk of Court and the Pinellas County Clerk of Court are closed. A managing judge is necessary to address election-related issues to ensure a timely response, consistency, and transparency.

In accordance with Article V, section 2, Florida Constitution, Florida Rule of General Practice and Judicial Administration 2.215, and section 43.26, Florida Statutes,

IT IS ORDERED:

1. The Chief Judge, or the Chief Judge's designee, will be the judicial officer who will oversee lawsuits involving the election process in Pasco County and Pinellas County on Tuesday, March 19, 2024; Tuesday, August 20, 2024; and Tuesday, November 5, 2024. This includes lawsuits filed by a candidate, the candidate's party organization, the supervisor of elections, the media, or an interested party. This also includes emergency petitions filed on any of the above Election Days.

2. New filings will be marked in the e-portal as "emergency" in order for the Clerk of the Court's Office to docket the filing and bring it to the attention of the Chief Judge or the Chief Judge's designee.

3. Upon receipt of a newly-filed civil action arising from any election taking place in Pasco County, Florida on Tuesday, March 19, 2024; Tuesday, August 20, 2024; and Tuesday, November 5, 2024, the Pasco County Clerk of the Court shall immediately notify the Chief Judge or the Chief Judge's designee.

4. Upon receipt of a newly-filed civil action arising from any election taking place in Pinellas County, Florida on Tuesday, March 19, 2024; Tuesday, August 20, 2024; and Tuesday, November 5, 2024, the Pinellas County Clerk of the Court shall immediately notify the Chief Judge or the Chief Judge's designee.

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 15 day of January 2024.

Shawn Crane, Chief Judge

cc: All Judges
The Honorable Bruce Bartlett, State Attorney
The Honorable Sara Mollo, Public Defender
The Honorable Nikki Alvarez-Sowles, Clerk & Comptroller, Pasco County
The Honorable Ken Burke, Clerk of the Circuit Court, Pinellas County
The Honorable Chris Nocco, Pasco County Sheriff
The Honorable Bob Gualtieri, Pinellas County Sheriff
Jennifer Parker, Trial Courts Administrator
Michele Emmerman, Deputy Trial Courts Administrator
Ita M. Neymotin, Regional Counsel, Second District
Ngozi Acholonu, Assistant Regional Counsel, Second District
Kimberly Thompson, Chief Operations Officer, Pasco County Clerk's Office
Brian E. Corley, Pasco County Supervisor of Elections
Julie Marcus, Pinellas County Supervisor of Elections
Law Libraries, Pinellas and Pasco County
Bar Associations, Pinellas and Pasco County

EXHIBITS B-D:

Clerk's Office Emails/Case Assignment

Christopher Gleason <cpgleason72@gmail.com>

Public Records Request – Administrative Case Assignment Data and Logs for Case No. 24-003717-CI and Case No. 24-003995-CI

Tran, Hien V <htran@mypinellasclerk.gov> Fri, Apr 25, 2025 at 1:44 PM
To: "cpgleason72@gmail.com" <cpgleason72@gmail.com>

Good afternoon Mr. Gleason,

Thank you again for contacting the office of Ken Burke, Clerk of the Circuit Court and Comptroller. I apologize that it took a little longer to compile the information for you. I have attached the Administrative Order that we follow when cases dealing with elections are filed. I have also attached the strings of email communication between our office and the Chief Judge regarding the assignment of the case. There are no fees associated to the information I've provided you. Please let me know if I can be of further assistance. Thank you.

Serving you,

Hien (Robert) Tran, BS Business Administration, CPM
Director of Admin | Clerk Administration
Office of Ken Burke, Clerk of the Circuit Court and Comptroller
Pinellas County, Florida
315 Court Street, Clearwater, FL 33756
Office (727) 464-4916 | Mobile (727) 686-4871 | htran@mypinellasclerk.gov

Sign up today and protect yourself from FRAUD!

Please Note: All mail sent to and from Pinellas County is subject to the Public Records Laws of Florida.

4 attachments

SAD-RM454-K25042512500.pdf
120K

SAD-RM454-K25042512510.pdf
442K

SAD-RM454-K25042512511.pdf
268K

SAD-RM454-K25042512520.pdf
148K

Tran, Hien V

From: Gross, Justin E
Sent: Thursday, September 12, 2024 3:01 PM
To: Kovach, Kimberly M
Subject: RE: 24-003995-CI CHRISTOPHER GLEASON v JULIE MARCUS etc and PINELLAS COUNTY CANVASSING BOARD

For sure.

Justin

Justin Gross, CPM
Supervisor, Front Counter/Self-Help
Civil Court Records
Office of Ken Burke, Clerk of the Circuit Court and Comptroller
Pinellas County, Florida
315 Court Street Room 170, Clearwater, FL 33756
Office: (727) 464-3274 | Fax: (727) 464-5566
jgross@mypinellasclerk.gov | www.mypinellasclerk.gov

~Serving You~

Please Note: All mail sent to and from Pinellas County is subject to the Public Records Laws of Florida.

From: Kovach, Kimberly M <kkovach@mypinellasclerk.gov>
Sent: Thursday, September 12, 2024 2:10 PM
To: Gross, Justin E <jgross@mypinellasclerk.gov>
Subject: RE: 24-003995-CI CHRISTOPHER GLEASON v JULIE MARCUS etc and PINELLAS COUNTY CANVASSING BOARD

Hi,

Can you ensure that tickets have been made to CT for all of these cases to be listed under the high-profile section of the Clerk's website?

Serena's Law

Search for Respondents Where There is a Final Judgment for the Protection of a Minor

View High Profile Court Cases

Thanks,

Kimberly (Kim) Kovach, MPA, CPM
Assistant Manager,
Civil Court Records
Office of Ken Burke, Clerk of the Circuit Court and Comptroller
Pinellas County, Florida
315 Court Street, Clearwater, FL 33756
Office (727) 464-3275 | Fax (727) 464-5566
kkovach@mypinellasclerk.gov | www.mypinellasclerk.gov

Please Note: All mail sent to and from Pinellas County is subject to the Public Records Laws of Florida.

From: Gross, Justin E <jgross@mypinellasclerk.gov>
Sent: Friday, September 6, 2024 2:17 PM
To: Crane, Shawn <scrane@jud6.org>; Muscarella, Patricia <tMuscarella@jud6.org>
Cc: Parker, Jennifer <jparker@jud6.org>; Siara, Lyndsey <LSiara@jud6.org>; Emmerman, Michele <MEmmerman@jud6.org>; Smith, Louise <LSmith@jud6.org>; Carter, Solandia N <scarter@mypinellasclerk.gov>; Kovach, Kimberly M <kkovach@mypinellasclerk.gov>; DiGennaro, Kellie A <kdigennaro@mypinellasclerk.gov>; Tran, Hien V <htran@mypinellasclerk.gov>; Carpenter, Katherine J <kcarpenter@mypinellasclerk.gov>; Burgess, William R <wburgess@mypinellasclerk.gov>; Bateman, David J <djbateman@mypinellasclerk.gov>; Del Rio, Teresa S <tdelrio@mypinellasclerk.gov>; Burke, Ken <kburke@mypinellasclerk.gov>
Subject: RE: 24-003995-CI CHRISTOPHER GLEASON v JULIE MARCUS etc and PINELLAS COUNTY CANVASSING BOARD

Thank you, your honor.

All four of these matters are now assigned to Judge Muscarella. All future such matters will be assigned her, unless you specify otherwise. We will, of course, continue to inform you both immediately of any such filings.

Respectfully,

Justin

Justin Gross, CPM
Supervisor, Front Counter/Self-Help
Civil Court Records
Office of Ken Burke, Clerk of the Circuit Court and Comptroller
Pinellas County, Florida
315 Court Street Room 170, Clearwater, FL 33756
Office: (727) 464-3274 | Fax: (727) 464-5566
jgross@mypinellasclerk.gov | www.mypinellasclerk.gov

~Serving You~

Please Note: All mail sent to and from Pinellas County is subject to the Public Records Laws of Florida.

From: Crane, Chief Judge Shawn <scrane@jud6.org>
Sent: Friday, September 6, 2024 2:09 PM
To: Gross, Justin E <jgross@mypinellasclerk.gov>; Muscarella, Patricia <tMuscarella@jud6.org>

Cc: Parker, Jennifer <jparker@jud6.org>; Siara, Lyndsey <LSiara@jud6.org>; Emmerman, Michele <MEmmerman@jud6.org>; Smith, Louise <LSmith@jud6.org>
Subject: RE: 24-003995-CI CHRISTOPHER GLEASON v JULIE MARCUS etc and PINELLAS COUNTY CANVASSING BOARD

This Message Is From an External Sender
This message came from outside your organization.
Report Suspicious

Correct.

Shawn Crane, Chief Judge
Sixth Judicial Circuit
Pinellas County Justice Center
14250 49th Street North, Suite J4.210
Clearwater, FL 33762
P: (727) 464-6493 | (727) 847-8161 | scrane@jud6.org
www.jud6.org

Please note that Florida has a very broad public records law. Most written communications to or from state officials regarding state business are considered public records. Your e-mail message may be subject to public disclosure upon request.

From: Gross, Justin E <jgross@mypinellasclerk.gov>
Sent: Friday, September 6, 2024 12:02 PM
To: Crane, Chief Judge Shawn <scrane@jud6.org>; Muscarella, Judge <tMuscarella@jud6.org>
Cc: Parker, Jennifer <jparker@jud6.org>; Siara, Lyndsey <LSiara@jud6.org>; Emmerman, Michele <MEmmerman@jud6.org>; Smith, Louise <LSmith@jud6.org>
Subject: RE: 24-003995-CI CHRISTOPHER GLEASON v JULIE MARCUS etc and PINELLAS COUNTY CANVASSING BOARD

Thank you, your honor.

Just to clarify, would you like us to reassign the two previous elections-related filings that were assigned to Judge Ramsberger to Judge Muscarella? Would you like us to reassign any new elections-related filings to Judge Muscarella?

We have had a total of four this year so far:

24-003717-CI Christopher Gleason v. Julie Marcus et al (currently assigned to Judge Ramsberger)
24-003892-CI Neelam Taneja Perry v. Robert Rocky Rochford et al (currently assigned to Judge Muscarella)
24-003939-CI John William Liccione v. Julie Marcus et al (currently assigned to Judge Ramsberger)
24-003995-CI Christopher Gleason v. Julie Marcus et al (currently assigned to Judge Ramsberger)

Kind Regards,

Justin

Justin Gross, CPM

Supervisor, Front Counter/Self-Help
Civil Court Records
Office of Ken Burke, Clerk of the Circuit Court and Comptroller
Pinellas County, Florida
315 Court Street Room 170, Clearwater, FL 33756
Office: (727) 464-3274 | Fax: (727) 464-5566
jgross@mypinellasclerk.gov | www.mypinellasclerk.gov

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From: Crane, Chief Judge Shawn <scrane@jud6.org>
Sent: Friday, September 6, 2024 11:44 AM
To: Gross, Justin E <jgross@mypinellasclerk.gov>; Muscarella, Patricia <tMuscarella@jud6.org>
Cc: Parker, Jennifer <jparker@jud6.org>; Siara, Lyndsey <LSiara@jud6.org>; Emmerman, Michele <MEmmerman@jud6.org>; Smith, Louise <LSmith@jud6.org>
Subject: RE: 24-003995-CI CHRISTOPHER GLEASON v JULIE MARCUS etc and PINELLAS COUNTY CANVASSING BOARD

Justin

Thank you for the update. These cases, Neelan Taneja Perry etc cases, and related cases are to be reassigned to Judge Muscarella.

Have a safe and restful weekend.

Shawn Crane, Chief Judge
Sixth Judicial Circuit
Pinellas County Justice Center
14250 49th Street North, Suite J4.210
Clearwater, FL 33762
P: (727) 464-6493 | (727) 847-8161 | scrane@jud6.org
www.jud6.org

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weekend.

From: Gross, Justin E <jgross@mypinellasclerk.gov>
Sent: Friday, September 6, 2024 11:28 AM
To: Crane, Chief Judge Shawn <scrane@jud6.org>
Cc: Smith, Louise <LSmith@jud6.org>; Carter, Solandia N <scarter@mypinellasclerk.gov>; Kovach, Kimberly M <kkovach@mypinellasclerk.gov>; Tran, Hien V <htran@mypinellasclerk.gov>; Bateman, David J <djbateman@mypinellasclerk.gov>; Carpenter, Katherine J <kcarpenter@mypinellasclerk.gov>; Burgess, William R <wburgess@mypinellasclerk.gov>; Del Rio, Teresa S <tdelrio@mypinellasclerk.gov>; Burke, Ken <kburke@mypinellasclerk.gov>
Subject: 24-003995-CI CHRISTOPHER GLEASON v JULIE MARCUS etc and PINELLAS COUNTY CANVASSING BOARD

Good morning, Chief Judge Crane.

A Civil action seeking an injunction related to the recent primary election has been filed against our Supervisor of Elections and other parties. Per AO 2024-003, we are to notify your office immediately of such filings. Can you clarify whether the case should be assigned to yourself or another designee? If designee, please indicate which judicial officer the case should be reassigned to. Upon confirmation, we will reassign the case.

The plaintiff previously filed case no. 24-003717-CI against the Supervisor of Elections et al.

We appreciate your assistance. Please let us know if you have any questions.

Thank you,

Justin

Justin Gross, CPM
Supervisor, Front Counter/Self-Help
Civil Court Records
Office of Ken Burke, Clerk of the Circuit Court and Comptroller
Pinellas County, Florida
315 Court Street Room 170, Clearwater, FL 33756
Office: (727) 464-3274 | Fax: (727) 464-5566
jgross@mypinellasclerk.gov | www.mypinellasclerk.gov

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Tran, Hien V

From: Kovach, Kimberly M
Sent: Thursday, August 29, 2024 2:52 PM
To: Gross, Justin E
Cc: Carter, Solandia N
Subject: FW: 24-3717-CI CHRISTOPHER GLEASON V. JULIE MARCUS

Thanks,

Kimberly (Kim) Kovach, MPA, CPM
Assistant Manager,
Civil Court Records
Office of Ken Burke, Clerk of the Circuit Court and Comptroller
Pinellas County, Florida
315 Court Street, Clearwater, FL 33756
Office (727) 464-3275 | Fax (727) 464-5566
kkovach@mypinellasclerk.gov | www.mypinellasclerk.gov

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From: Smith, Louise <LSmith@jud6.org>
Sent: Friday, August 23, 2024 3:21 PM
To: Kovach, Kimberly M <kkovach@mypinellasclerk.gov>
Cc: Carter, Solandia N <scarter@mypinellasclerk.gov>; Tran, Hien V <htran@mypinellasclerk.gov>
Subject: RE: 24-3717-CI CHRISTOPHER GLEASON V. JULIE MARCUS

This Message Is From an External Sender
This message came from outside your organization.
Report Suspicious

Hi Kim,

This case is being handled by Senior Judge Peter Ramsberger.

From: Kovach, Kimberly M <kkovach@mypinellasclerk.gov>
Sent: Friday, August 23, 2024 3:17 PM
To: Smith, Louise <LSmith@jud6.org>
Cc: Carter, Solandia N <scarter@mypinellasclerk.gov>; Tran, Hien V <htran@mypinellasclerk.gov>
Subject: RE: 24-3717-CI CHRISTOPHER GLEASON V. JULIE MARCUS

Good afternoon,

We wanted to follow up on this request. The case is currently assigned to Judge Williams, however summons were issued on 8/22/24 along with additional documents. Please let us know.

Thanks,

Kimberly (Kim) Kovach, MPA, CPM
Assistant Manager,
Civil Court Records
Office of Ken Burke, Clerk of the Circuit Court and Comptroller
Pinellas County, Florida
315 Court Street, Clearwater, FL 33756
Office (727) 464-3275 | Fax (727) 464-5566
kkovach@mypinellasclerk.gov | www.mypinellasclerk.gov

Please Note: All mail sent to and from Pinellas County is subject to the Public Records Laws of Florida.

From: Kovach, Kimberly M
Sent: Tuesday, August 20, 2024 4:43 PM
To: Smith, Louise <LSmith@jud6.org>
Cc: Carter, Solandia N <scarter@mypinellasclerk.gov>; Tran, Hien V <htran@mypinellasclerk.gov>
Subject: RE: 24-3717-CI CHRISTOPHER GLEASON V. JULIE MARCUS

Good afternoon,

Thank you for your quick response.

Thanks,

Kimberly (Kim) Kovach, MPA, CPM
Assistant Manager,
Civil Court Records
Office of Ken Burke, Clerk of the Circuit Court and Comptroller
Pinellas County, Florida
315 Court Street, Clearwater, FL 33756
Office (727) 464-3275 | Fax (727) 464-5566
kkovach@mypinellasclerk.gov | www.mypinellasclerk.gov

Please Note: All mail sent to and from Pinellas County is subject to the Public Records Laws of Florida.

From: Smith, Louise <LSmith@jud6.org>
Sent: Tuesday, August 20, 2024 4:07 PM
To: Kovach, Kimberly M <kkovach@mypinellasclerk.gov>
Cc: Carter, Solandia N <scarter@mypinellasclerk.gov>; Tran, Hien V <htran@mypinellasclerk.gov>
Subject: RE: 24-3717-CI CHRISTOPHER GLEASON V. JULIE MARCUS

Good afternoon Kimberly,

I have forwarded on to Judge Crane and will let you know when he make a determination as to his designee.

Thank you,

Louise Smith, Judicial Assistant
Office of Chief Judge Shawn Crane | Sixth Judicial Circuit
Pinellas County Justice Center
14250 49th Street North, Suite J4.210
Clearwater, FL 33762

P: (727) 464-6493 | (727) 847-8161 | lsmith@jud6.org
www.jud6.org

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From: Kovach, Kimberly M <kkovach@mypinellasclerk.gov>
Sent: Tuesday, August 20, 2024 3:46 PM
To: Section60 <Section60@jud6.org>; Smith, Louise <LSmith@jud6.org>
Cc: Carter, Solandia N <scarter@mypinellasclerk.gov>; Tran, Hien V <htran@mypinellasclerk.gov>
Subject: 24-3717-CI CHRISTOPHER GLEASON V. JULIE MARCUS

Good afternoon,

A new case was filed against the Supervisor of Election. Per AO 2024-003, we are to notify your office of such filings. Can you clarify if the case should be assigned to Judge Crane or the designee? If the designee, can you confirm who the case should be reassigned to? Upon confirmation, we will reassign the case.

We appreciate your assistance. Please let me know if you have any questions.

Thanks,

Kimberly (Kim) Kovach, MPA, CPM
Assistant Manager,
Civil Court Records
Office of Ken Burke, Clerk of the Circuit Court and Comptroller
Pinellas County, Florida
315 Court Street, Clearwater, FL 33756
Office (727) 464-3275 | Fax (727) 464-5566
kkovach@mypinellasclerk.gov | www.mypinellasclerk.gov

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Summary | Detail | Parties | Events | Service | Hearings | Conditions | Causes | Disposition | Time Slots | Financial | Prot. Orders | Warrants | Bonds | Exhibits | Documents | Appeals | Notes | Notifications | State Report

CHRISTOPHER GLEASON Vs. JULIE MARCUS, et al
Type INJUNCTION - CIRCUIT

Style: CHRISTOPHER GLEASON Vs. JULIE MARCUS, et al
☑ Auto Style

Case Type
INJUNCTION - CIRCUIT
Subtype:
File Date: 08/20/2024
Security:

Case Files
IMAGE ONLY

Case Assignment

Case Number	24-003717-CI
Court	Section 7
Date Assigned	09/06/2024
Judicial Officer	MUSCARELLA, PATRICIA ANN
Reassigned	09/06/2024 - OTHER PER CHIEF JUDGE
Case Number	24-003717-CI
Court	Section 20
Date Assigned	08/23/2024
Judicial Officer	RAMSBERGER, PETER
Reassigned	08/23/2024 - OTHER AO 2024-003
Case Number	24-003717-CI
Court	Section 20
Date Assigned	08/20/2024
Judicial Officer	ANDREWS, MICHAEL F

Updated: 09/06/2024 2:11 PM Gross, Justin
Created: 08/23/2024 5:10 PM Kovach, Kimberly
Judicial Officer manually assigned.

Magistrate Assignment

Case Cross Reference Numbers

UNIFORM CASE NUMBER	522024CA003717XXCICI
APPEAL CASE NUMBER	2D2024-2687

Case Flags
APPEALED
NOTICE OF HEARING

Case Status

08/20/2024 OPEN

Additional Barcodes

Related Cases

Case Number	24-003995-CI
Comment	
Style	CHRISTOPHER GLEASON Vs. JULIE MARCUS, et al
Court	Section 7
Reason	RELATED
Filed	09/06/2024
Status	REOPENED - OTHER

Summary | **Detail** | Parties | Events | Service | Hearings | Conditions | Causes | Disposition | Time Stds | Financial | Prot. Orders | Warrants | Bonds | Exhibits | Documents | Appeals | Notes | Notifications | State Report

CHRISTOPHER GLEASON Vs. JULIE MARCUS, et al

Type INJUNCTION - CIRCUIT

Style CHRISTOPHER GLEASON
Vs.
JULIE MARCUS, et al

☑ Auto Style

Case Assignment

Reassign

Case Number	24-003717-CI
Court	Section 7
Date Assigned	09/06/2024
Judicial Officer	MUSCARELLA, PATRICIA ANN
Reassigned	09/06/2024 - OTHER PER CHIEF JUDGE
Case Number	24-003717-CI
Court	Section 20
Date Assigned	08/23/2024
Judicial Officer	RAMSBERGER, PETER
Reassigned	08/23/2024 - OTHER AO 2024-003
Case Number	24-003717-CI
Court	Section 20
Date Assigned	08/20/2024
Judicial Officer	ANDREWS, MICHAEL F

Updated: 08/23/2024 5:10 PM Kovach, Kimberly
Created: 08/20/2024 1:46 PM McPherson, Traci
Judicial Officer system assigned.

Magistrate Assignment

Case Cross Reference Numbers

UNIFORM CASE NUMBER	522024CA003717XXCICI
APPEAL CASE NUMBER	2D2024-2687

Case Status

08/20/2024 OPEN

Related Cases

Case Number	24-003995-CI
Comment	
Style	CHRISTOPHER GLEASON Vs. JULIE MARCUS, et al
Court	Section 7
Reason	RELATED
Filed	09/06/2024
Status	REOPENED - OTHER

Case Type

INJUNCTION - CIRCUIT

Subtype
File Date 08/20/2024
Security

Case Files

IMAGE ONLY

Case Flags

APPEALED
NOTICE OF HEARING

Additional Barcodes

Summary | Detail | Parties | Events | Service | Hearings | Conditions | Causes | Disposition | Time Slide | Financial | Prot. Orders | Warrants | Bonds | Exhibits | Documents | Appeals | Notes | Notifications | State Report

CHRISTOPHER GLEASON Vs. JULIE MARCUS, et al
Type INJUNCTION - CIRCUIT

Style: CHRISTOPHER GLEASON
Vs
JULIE MARCUS, et al

☑ Auto Style

Case Type
INJUNCTION - CIRCUIT
Subtype:
File Date: 08/20/2024
Security:

Case Files
IMAGE ONLY

Case Assignment

Reassign

Case Number	24-003717-CI
Court	Section 7
Date Assigned	09/06/2024
Judicial Officer	MUSCARELLA, PATRICIA ANN

Created: 09/06/2024 2:11 PM Gross, Justin
Judicial Officer manually assigned.

Reassigned	09/06/2024 - OTHER PER CHIEF JUDGE
Case Number	24-003717-CI
Court	Section 20
Date Assigned	08/23/2024
Judicial Officer	RAMSBERGER, PETER
Reassigned	08/23/2024 - OTHER AO 2024-003
Case Number	24-003717-CI
Court	Section 20
Date Assigned	08/20/2024
Judicial Officer	ANDREWS, MICHAEL F

Magistrate Assignment

Case Cross Reference Numbers

UNIFORM CASE NUMBER	522024CA003717XXCICI
APPEAL CASE NUMBER	2D2024-2687

Case Flags
APPEALED
NOTICE OF HEARING

Case Status

08/20/2024 OPEN

Additional Barcodes

Related Cases

Case Number	24-003995-CI
Comment	
Style	CHRISTOPHER GLEASON Vs. JULIE MARCUS, et al
Court	Section 7
Reason	RELATED
Filed	09/06/2024
Status	REOPENED - OTHER

Summary | Detail | Parties | Events | Service | Hearings | Conditions | Causes | Disposition | Time Stds | Financial | Prot. Orders | Warrants | Bonds | Exhibits | Documents | Appeals | Notes | Notifications | State Report

CHRISTOPHER GLEASON Vs. JULIE MARCUS, et al

Type OTHER CIVIL - CIRCUIT

Style: CHRISTOPHER GLEASON
Vs.
JULIE MARCUS, et al

☑ Auto Style

Case Type: OTHER CIVIL - CIRCUIT
Subtype:
File Date: 09/06/2024
Security:

Case Files: IMAGE ONLY

Case Assignment

Reassign

Case Number	24-003995-CI
Court	Section 7
Date Assigned	09/06/2024
Judicial Officer	MUSCARELLA, PATRICIA ANN
Reassigned	09/06/2024 - OTHER PER CHIEF JUDGE
Case Number	24-003995-CI
Court	Section 20
Date Assigned	09/06/2024
Judicial Officer	ANDREWS, MICHAEL F

Updated: 09/06/2024 11:57 AM Gross, Justin
Created: 09/06/2024 10:59 AM Smith, Allen
Judicial Officer system assigned.

Magistrate Assignment

Case Cross Reference Numbers

UNIFORM CASE NUMBER	522024CA003995XXCICI
APPEAL CASE NUMBER	2D2024-2688

Case Flags
APPEALED
CONFIDENTIAL/SEALED CASE
ALL EXHIBITS CONFIDENTIAL
NOTICE OF HEARING

Case Status

11/21/2024 REOPENED - OTHER

Additional Barcodes

Related Cases

Case Number	24-003717-CI
Comment	
Style	CHRISTOPHER GLEASON Vs. JULIE MARCUS, et al
Court	Section 7
Reason	RELATED
Filed	08/20/2024
Status	OPEN

Summary | Detail | Parties | Events | Service | Hearings | Conditions | Causes | Disposition | Time Stds | Financial | Prof. Orders | Warrants | Bonds | Exhibits | Documents | Appeals | Notes | Notifications | State Report

CHRISTOPHER GLEASON Vs. JULIE MARCUS, et al

Type: OTHER CIVIL - CIRCUIT

Style: CHRISTOPHER GLEASON
Vs
JULIE MARCUS, et al

☑ Auto Style

Case Assignment

Reassign

Case Number: 24-003995-CI
Court: Section 7
Date Assigned: 09/06/2024
Judicial Officer: MUSCARELLA, PATRICIA ANN

Created: 09/06/2024 11:57 AM Gross, Justin
Judicial Officer manually assigned.

Reassigned: 09/06/2024 - OTHER
PER CHIEF JUDGE

Case Number: 24-003995-CI
Court: Section 20
Date Assigned: 09/06/2024
Judicial Officer: ANDREWS, MICHAEL F

Case Type

OTHER CIVIL - CIRCUIT

Subtype:
File Date: 09/06/2024
Security:

Case Files

IMAGE ONLY

Magistrate Assignment

Case Cross Reference Numbers

UNIFORM CASE NUMBER	522024CA003995XXCICI
APPEAL CASE NUMBER	2D2024-2688

Case Flags

APPEALED
CONFIDENTIAL/SEALED CASE
ALL EXHIBITS CONFIDENTIAL
NOTICE OF HEARING

Case Status

11/21/2024 REOPENED - OTHER

Additional Barcodes

Related Cases

Case Number: 24-003717-CI
Comment:
Style: CHRISTOPHER GLEASON Vs. JULIE MARCUS, et al

Court: Section 7
Reason: RELATED
Filed: 08/20/2024
Status: OPEN

Tab S – Transcript of First Hearing: County attorneys' false "19,000 hours" claim.

Filing # 207152309 E-Filed 09/18/2024 11:44:46 AM

EXHIBIT A

to Response in Opposition to Motion for Reconsideration (Doc. 24)

Full Transcript of Hearing on August 29th, 2024.

ELECTRONICALLY FILED 09/18/2024 11:44:46 AM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

IN THE CIRCUIT COURT OF THE SIXTH
JUDICIAL CIRCUIT OF THE STATE OF FLORIDA,
IN AND FOR PINELLAS COUNTY, FLORIDA

CIVIL DIVISION
CASE NO.: 24-003717-CI

CHRISTOPHER GLEASON,

Plaintiff,

-vs-

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections; et. al.,

Defendants.

VIDEO TELECONFERENCE PROCEEDINGS HELD BEFORE
THE HONORABLE PETER RAMSBERGER

DATE TAKEN:	Thursday, August 29, 2024
TIME:	Commencing at 10:00 a.m.
PLACE:	Pinellas County Courthouse 545 First Avenue North Room 2B St. Petersburg, Florida 33701

Examination of the witness taken before:

Kelley N. Black, RPR, FPR-C, CCR #3441
Maxa Enterprises, Inc.
28050 US Highway 19 N, Suite 105
Clearwater, Florida 33761
(727) 441-2404

APPEARANCES:

CHRISTOPHER GLEASON
1628 Sand Key Estates Court
Clearwater, Florida 33767
gleasonforpinellas@gmail.com

Pro se.

KELLY L. VICARI, ESQUIRE
JARED D. KAHN, ESQUIRE
Assistant County Attorney
315 Court Street
Clearwater, Florida 33756
(727) 464-3354
kvicari@pinellascounty.org

Attorney for the Defendants

I N D E X

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Certificate of Court Reporter	33

PROCEEDINGS

COURT DEPUTY: All rise. Court is now in session with the Honorable Senior Circuit Court Judge Peter Ramsberger presiding.

THE COURT: Whoa, a lot of people. Have a seat, please.

Everybody doing all right?

MS. VICARI: Yes, Your Honor.

THE COURT: Let me see, we'll go on the record. Court reporter is here.

The case that is set for hearing this morning is Case No. 24-3717 and I'm Judge Ramsberger, the other one. That's what they tell me. I don't know what that means. I guess there's another one that shares the same last name.

I have Christopher Gleason, who is the plaintiff.

Are you Christopher Gleason?

MR. GLEASON: I am, Your Honor.

THE COURT: Good morning.

MR. GLEASON: Good morning.

THE COURT: You are representing yourself?

MR. GLEASON: Yes.

THE COURT: Okay. And then I have, I guess, several defendants. Julie Marcus is a defendant.

MS. VICARI: Yes, Your Honor. My name is Kelly Vicari. I represent the defendants collectively in this case, Julie Marcus, Matt Smith and Dustin Chase, the three named defendants.

THE COURT: And tell me your name again? I'm sorry.

MS. VICARI: Kelly Vicari, V-i-c-a-r-i.

THE COURT: Good morning.

MS. VICARI: Good morning.

THE COURT: And you've got some other folks at the table?

MS. VICARI: I have second chair, Jared Kahn from my office.

Jessica Haas, she's here to help with any technical difficulties we may encounter.

And we have Defendant, Matt Smith here in the courtroom.

THE COURT: Matt Smith?

MR. SMITH: Yes.

THE COURT: I have defendants Julie Marcus, who is the Supervisor of Elections in Pinellas County?

MS. VICARI: Yes, Your Honor.

THE COURT: Dustin Chase. What's Dustin

Chase' position?

MS. VICARI: He is a Deputy of Supervisor of Elections Office.

THE COURT: Okay. And then Matt Smith.

MS. VICARI: Yes.

THE COURT: What position is Matt Smith?

MS. VICARI: He is legal counsel to Julie Marcus at the Supervisor of Elections.

THE COURT: All right. So everyone's here.

And the -- when the Complaint came in, it was reviewed to see if it qualified for Emergency Temporary Injunction. And that was extensively reviewed. It was a lot of work -- put a lot of effort in this, Mr. Gleason. Obviously there's a lot of effort that you put in. And the Court did not issue that temporary injunction.

There was also a Motion for Reconsideration that was also filed. Again, a lot of effort went into the motion, spent a lot of time on it. The motion was denied. So the case is still an active, pending case.

The Complaint is still here, it's filed.

Has everyone been served with the Complaint?

MS. VICARI: Yes, Your Honor.

THE COURT: There has been service?

MS. VICARI: Yes.

THE COURT: Okay. And then you'll file a response within so many days?

MS. VICARI: Yes, Your Honor, the deadline to respond is September 11.

THE COURT: So that will happen in the normal course.

However, it was brought to my attention by a really talented staff attorney, Mr. Williford, who goes, you know, we need to set an accelerated hearing under the 119, Public Records Act. We need to do that. And I said, yeah, if that's what the statute says, we need to do it. And he assured me we need to do it, so here we are.

This is the hearing under 119, I think it might be paren one, the first part of 119 that says the Court shall set an accelerated hearing. So here we are in compliance with the accelerated hearing.

So having said that, my first question usually is do the folks want a chance to talk to each other? Lots of time folks don't communicate with each other, the courtroom is the first time they see each other, maybe there's something to talk about, maybe there's some temporary

resolution, a Band-Aid they want to put on it so the Court doesn't have to get all into it. And if you-all want the chance to talk to each other, I'd be happy to let you do that. I'll be happy to step off and let you chat. If you don't want to do that we can start the hearing.

Anyone want to talk to each other? If you want to, I'll give you that opportunity. If you want to, I'll let you know you certainly don't have to. It's up to you.

MR. GLEASON: I'm not an attorney. I did stay at a Holiday Inn once, but I'm not an attorney, Your Honor.

THE COURT: A Holiday Inn?

MR. GLEASON: I stayed at a Holiday Inn once, but I'm not an attorney.

THE COURT: I know that because you stayed at the Holiday Inn.

Is anyone here from Holiday Inn? I'm in trouble. That was a joke. Oh, I'm in trouble with the Holiday Inn people now.

I don't know, you're obviously here seeking something today.

MR. GLEASON: Yes, Your Honor.

THE COURT: The temporary injunction has

already been denied. That's not before the Court here today.

Obviously I guess you're not happy with the public records request response, I take it. But if there's something you-all want to talk about, I'll be happy to step off and you-all can talk formally off the record. If you don't want to, you don't have to. We'll start this accelerated hearing.

It's your case, Mr. Gleason. Do you want a minute to talk to the attorney, Mrs. Vicari at all?

MR. GLEASON: I'll do that.

THE COURT: Good. I'll step off for a few minutes. What you say is confidential, can't be repeated, can't be used against you. It's called a settlement discussion. If you-all want to chat about it, whatever, maybe put a Band-Aid on it until we get to the next stage of the process, have at it. If you don't want to, I'll be right next door, the deputy will come and get me. Fair enough?

MR. GLEASON: Fair enough.

THE COURT: All right. You-all talk, let me know when you want me to come back.

COURT DEPUTY: All rise.

(There was a brief recess.)

COURT DEPUTY: All rise, please. Court is back in session.

THE COURT: Okay, have a seat.

Mr. Gleason, I'll start with you for this accelerated hearing.

What would you like the Court to do at this point?

MR. GLEASON: I would like the Court to issue out a subpoena for documents that are all related to the public records and the conduct of the election that was held on August 20th.

THE COURT: Well, you're confusing me here a little bit. You want me to issue a subpoena?

MR. GLEASON: To the defendants to produce, or order them to produce the documents that they need to, such as the audit logs, the chain of custody for the Vote by Mail Ballots that were --

THE COURT: Is this a written request for all the documents you specified?

MR. GLEASON: Yes, Your Honor.

THE COURT: Okay. Where is that written request, in the Complaint?

MR. GLEASON: It was -- let's see. Here we

go.

THE COURT: Does the defense acknowledge that you've received a request for records?

MS. VICARI: Your Honor, I would.

THE COURT: Because what I'm hearing right now is he doesn't think you're complying with his request for public records.

MS. VICARI: Your Honor, we're here for a very limited purpose today. Within the Complaint, when you read the Complaint, there are only two requests that Mr. Gleason is alleging that were made that were not appropriately responded to.

The first request he details at Paragraphs 14 and 15 of the Complaint. Our position is that there was actually not a request for records made at that time, he asked for "information," which he was verbally given. So we would disagree on the first, that that does not even qualify as a public records request.

As to the second request that is within the Complaint, and that's at Paragraphs 30 and 31.

THE COURT: Of the Complaint?

MS. VICARI: Of the Complaint.

THE COURT: So there's no separate written request?

MS. VICARI: There is, Your Honor. It's my understanding 30 and 31 are discussing a second written request. There were two emails attached as exhibits to the Complaint. Those two emails, the first is from Mr. Gleason to the Supervisor of Elections, and the second is the response from the Supervisor of Elections.

It is my understanding that that is the public records request that we are here for today, that's what's been attached as an exhibit. And we are prepared to make the argument that that was appropriately responded to and that it -- you know, Mr. Gleason failed to follow through on what was necessary on his end to obtain those records.

Those are the only two that we are here for today.

To the extent that Mr. Gleason is trying to discuss other requests that are not contained within the Complaint, we would object to that. Only these two requests have been submitted. We've not been put on notice of a challenge to other requests, nor have those challenges been set for hearing here today.

So from our standpoint, we're dealing with these very two finite issues today.

THE COURT: Okay. Do you think Mr. Gleason's precluded if he wants to renew a public records request from resubmitting in writing exactly the public record request that he wants? Do you think he's precluded from doing that?

MS. WICARI: No, absolutely not, Your Honor. It's just that likely he will receive the same response from defendant, which is that there has to be an Oath of Affirmation because some of the records --

THE COURT: I'm sorry, a what?

MS. WICARI: It's an Oath of Affirmation. It's a document essentially stating that he is going to maintain the records as confidential. The records that he's asking for are Vote by Mail Ballot request information. Under Statute -- Florida Statute 101.622, that information is confidential and exempt from Chapter 119, unless you fall into an excepted category, one of which being that you are a candidate, and a candidate who has opposition.

So Mr. Gleason would qualify for those records; however, he needs to file an Oath of Affirmation stating that he agrees to keep the records confidential.

Second, rather, the request was so broad it was determined that it would take somewhere around 19,000 hours to respond to, so he was asked to either try to narrow that and the defendant would help him, or if not, they would proceed with the request as is, but it would result in a special service charge that would likely be significant that they would have to get back to him with.

THE COURT: Okay. Do you want to respond to that, Mr. Gleason?

MR. GLEASON: Yes, Your Honor. The requests that I made were -- was in particular for the record of Vote by Mail Ballot requests. I also made requests for the Returned as Undeliverable Vote by Mail Ballots. And I also made requests for chain of custody for all of these -- all of the received Vote by Mail Ballot requests.

I have many numerous outstanding requests that were made in writing with extreme specificity to the Pinellas County Supervisor of Elections office.

THE COURT: These are requests in writing?

MR. GLEASON: Yes, sir.

THE COURT: And where are these requests?

MR. GLEASON: They were -- some of them,

actually all of them they have copies of. They were sent via email.

THE COURT: They were sent by email?

MR. GLEASON: Yes, sir.

THE COURT: And when was that?

MR. GLEASON: Going back to logic and accuracy testing.

THE COURT: Okay. Were they attached to your Complaint?

MR. GLEASON: No. No, they were not, Your Honor.

THE COURT: What's that?

MR. GLEASON: No. No, they were not. Not all of them, no.

However, the Vote by Mail request information is contained in an electronic record. All of these records that I have requested are electronic records.

And Florida Administrative Code talks about all of these electronic records, so does public records records logs, they talk about how electronic records and the charges that -- the special service charge that the Pinellas County Supervisor of Election likes to tack onto everything, is typically for printed documents.

And if they are just producing the electronic record, that they are required by Florida law to retain, I just want the electronic records. And as they are electronic records, they should be free. There should be no service charge.

THE COURT: Counsel mentioned something about an Oath of Affirmation as to confidentiality. Do you want to address that?

MR. GLEASON: This is the first that I have ever heard of that, Your Honor.

THE COURT: Okay. I think she made reference to 101.622. Is that something you want to take a look at at some point, since you said you're unaware of it?

She just mentioned it. You don't have to do it right now, but she apparently indicated you have not complied with a requirement pertaining to I think what she said, confidentiality reference to an Oath of Affirmation.

MS. VICARI: Your Honor, I misspoke. Oath of Acquisition. It's an Oath of Acquisition.

THE COURT: Oath of Acquisition, I'm sorry.

MS. VICARI: I apologize, Your Honor.

THE COURT: Okay.

MS. VICARI: And I would refer the Court to

the exhibits, the response from Dustin Chase dated July 25th of 2024, which is attached to the Complaint. It says, "Dear Mr. Gleason, as a candidate with opposition, you are entitled to the list of Mail Ballot Requests after filling -- or filing your Oath of Acquisition."

THE COURT: Say that again, please, that whole thing.

MS. VICARI: Email dated Thursday, July 25th, 2024 from Dustin Chase to Mr. Gleason. It states, "Dear Mr. Gleason, as a candidate with opposition, you are entitled to the list of Mail Ballot Requests after filing your Oath of Acquisition." And then it goes on.

THE COURT: So it says you are entitled to it?

MS. VICARI: Yes.

THE COURT: Are you a candidate, I take it?

MR. GLEASON: I am, Your Honor. I'm a candidate.

THE COURT: Okay.

MR. GLEASON: So this form that they are referring to, I believe, is a form to get the Vote by Mail Ballot list that shows certain information in it.

I already have that. I obtained that vote -- statewide Vote by Mail Early Voting list directly from the State of Florida.

What I've requested was the electronic records that the Supervisor of Elections is required to maintain to include the order forms and the records of any telephone requests for Vote by Mail Ballots, any in-person in-writing requests for Vote by Mail Ballots, and any and all logs from their online ordering system for the Vote by Mail Ballots. That is what I am requesting.

And Statute 101.62 is very clear. It says that voters who have made the request can request that information, and so can qualified candidates.

And so, Your Honor, it's very simple, it is not a difficult request. The only reason why this request has been concealed has been to infer a benefit to Julie Marcus, also to my detriment, and the detriment of my campaign.

Now, part of the Complaint that was filed was about a Motion to Stop Election Fraud. Now, what we know is that --

THE COURT: Well, I'm not really getting into all --

MR. GLEASON: Okay.

THE COURT: -- the mitty gritty and the issue of the case. That's all going to get flushed out in the litigation process. Right now it's just this accelerated hearing under 119.

MR. GLEASON: Yes, Your Honor.

THE COURT: Is it your intention to provide an Oath of Acquisition back?

MR. GLEASON: I mean, I'll do it. I have no problem with that.

THE COURT: I mean, they asked you for it, right?

MR. GLEASON: Just now.

THE COURT: They didn't ask you for it previously in an email?

MR. GLEASON: No, Your Honor.

THE COURT: I thought you said you had it in an email.

MS. VICARI: Your Honor, there is an email that's attached to the Complaint. He attached the email to the Complaint where it clearly says, "Dear Mr. Gleason, as a candidate with opposition, you are entitled to the list of Mail Ballot Requests after filing your Oath of Acquisition."

THE COURT: That's in an email?

MS. VICARI: It's in the email. He attached

it to the Complaint itself.

MR. GLEASON: But that Oath of Acquisition, Your Honor, is for the statewide Vote by Mail list, not for the individual records.

THE COURT: Okay. Is it your intention to provide an Oath of Acquisition?

MR. GLEASON: I will. I absolutely will, Your Honor, if that's what it takes for me to get the records that I am lawfully entitled to.

THE COURT: I don't have the email, but it sounds like he said to you -- he being Dustin Chase?

MS. VICARI: Yes, Your Honor.

THE COURT: I'm sorry, I shouldn't use pronouns on the record.

Dustin Chase sent you an email and said send us the Oath of Acquisition. So if you intend to do that, then we're off and running in that area.

Is it your intention to do that?

MR. GLEASON: Yes, Your Honor.

THE COURT: What kind of time frame are we looking at?

MR. GLEASON: I'll have it to him today.

THE COURT: Oh, okay.

What else are you asking for here today under

this accelerated hearing under 119, Mr. Gleason?

MR. GLEASON: The log -- the logs -- the logs for any of the electronic Vote by Mail Ballot requests that were made via the Supervisor of Elections website.

THE COURT: Electronic Vote by Mail requests is what you're looking for, the log?

MR. GLEASON: The logs and the records. All the logs and the records for that. And they're electronic records so they should be --

THE COURT: Ms. Vicari, what is your response to that? He wants the logs.

MS. VICARI: Yes. Your Honor, I wish there was an overhead projector I could use.

THE COURT: I'm sorry?

MS. VICARI: I said I wish there was an overhead projector I could use. Is there?

THE COURT: Yeah, I like visual aids, sure.

MS. VICARI: Is there one? Can you help? It's in here somewhere?

MS. HAAS: No, it's in the back.

MS. VICARI: Oh, I can --

THE COURT: We also have a time constraint. I've got until 10:30, so we have seven or eight minutes.

MS. VICARI: May I approach the projector?

THE COURT: Of course, yes. Yes.

MS. VICARI: So Your Honor, I'm bringing this just to clarify these are the exhibits that were attached, the request that was previously made was for. And you can see there with an indentation, "copies of any and all logs, lists, and/or documents of the Pinellas County voters who requested Vote by Mail Ballot be mailed to them for the August 20th primary election."

That was the request that was received.

And in response, Mr. Gleason was advised that he would be entitled to the records after he filed that oath. But then additionally, Mr. Chase explained that the request is extremely broad, that it would require 18,000 hours to compile these logs, that under Florida law, the Supervisor is entitled to charge a special service fee.

And later down, in 1, 2, 3, the fourth paragraph it says, "We're prepared to work with you to narrow the scope of your request to make it more manageable and cost effective. For instance, if there are specific types of logs or subsets of information you are most interested, please let us know. However, to precede, we invite you to

either narrow the scope of the request to reduce the estimated time, or we can provide a full cost estimate for processing the entire request as you currently stated."

Your Honor, Mr. Gleason did not respond to this email.

So there was an attempt made by the Supervisor of Elections to potentially narrow the response. They advised him there would be a special service fee, and then they heard nothing. And again, Your Honor, in order to receive these records he would first have to file this Oath of Acquisition, which he did do with the State in June. It's -- the same documents can be received from the State or from the Supervisor of Elections directly.

So you know, the ball is really in his court, Your Honor.

MR. GLEASON: Your Honor, that's not exact --

THE COURT: Well, hang on just a second. Are you finished?

MS. VICARI: Yes, Your Honor.

THE COURT: Yeah, I wasn't sure they were done, Mr. Gleason.

MR. GLEASON: Your Honor, that statement is

false.

THE COURT: Which statement was that?

MR. GLEASON: The one that she said that they never heard back from me. I actually had made numerous --

THE COURT: Do you have a copy of the email with you that you responded back?

MR. GLEASON: I actually have it on video because one of the requests that I made was a verbal request at the Supervisor of Elections' office.

THE COURT: Do you have a written email response?

MR. GLEASON: I have several where they say that they responded and they said that they would be providing me the information in a timely manner.

THE COURT: My question is, she's just shown me that email. Do you acknowledge that email that I just looked at?

MR. GLEASON: Yes.

THE COURT: All right. Did you respond to that email with an email?

MR. GLEASON: No, I did not.

THE COURT: Did you respond in a separate

writing to that?

MR. GLEASON: Yes, Your Honor.

THE COURT: Do you have a copy of that separate writing?

MR. GLEASON: Not with me.

THE COURT: Do you acknowledge you got a separate written response? Because he just said he gave a separate written response to that email.

MS. VICARI: No, Your Honor, we're not aware of a separate written response.

THE COURT: You're not aware that you got a separate written response from Mr. Gleason?

MS. VICARI: No.

THE COURT: Do you have a copy of the written response?

MR. GLEASON: Not with me, Your Honor. I can produce it.

THE COURT: But you don't have an e-mail response?

MR. GLEASON: No.

THE COURT: Do you use written email in your written communication?

MR. GLEASON: Yes, Your Honor.

THE COURT: As a matter of course? And again, I'm not trying to invade your privacy here.

All right. Well, it seems to me at this point, I think I agree with counsel. I think the ball is in your court. She just showed me the email. You're not showing me a response to it. An email is out there.

I didn't see a deadline on the email. Is there a cutoff time?

MS. VICARI: It says, "If the response is not received within 30 days of the correspondence, we will consider this closed."

THE COURT: And when was that?

MS. VICARI: Thursday, July 25th, 2024.

THE COURT: Any reason we can't give him a 30-day extension at this point of time?

MS. VICARI: No, Your Honor, we could agree to that.

THE COURT: You will accept that, Mr. Gleason?

MR. GLEASON: I will accept it. Here's the issue --

THE COURT: I've got to stay on my point and then I'll go to the issue you're raising.

Defendants are willing to extend that 30 days they put in that email to give you 30 days to respond back with am email. Does that work for

you at this point?

MR. GLEASON: I'll have it to them today.

THE COURT: Okay, but within 30 days.

So is that an agreement?

MR. GLEASON: That's fine, Your Honor.

THE COURT: I want the record to reflect the parties have a stipulation. It's on the record and it's real clear, okay?

MS. VICARI: Yes, Your Honor.

THE COURT: So we got that.

Then you said something about another issue, Mr. Gleason. And we're getting ready to run out of time.

MR. GLEASON: Yes, Your Honor, here's the issue. I do actually have a verbal request for that same information that I specified in the email, and I specified for that verbally and I have --

THE COURT: Who did you speak with?

MR. GLEASON: One of the -- Ashley. Ashley from the Supervisor of Elections' office. And I have it right here.

THE COURT: Is that it?

MS. VICARI: Your Honor, that is the first --

MR. GLEASON: She sent me an email confirming

that.

MS. VICARI: I don't know who Ashley is. Can he provide more information? Dates? Times? Who is Ashley. Did Ashley know she was being recorded?

THE COURT: I think for purposes of these proceedings -- now if there is a lawsuit and we're going to go ahead and extend the 30 days to get the response, I think probably bringing documents to court is going to work best down the road as opposed to he said/she said. I'm not trying to take away that that happened. I'm not saying it didn't. But I think it would be a lot easier to get everything in writing as the litigation progresses and plays out its course.

So right now I'm going to leave it to Mr. Gleason is going to respond back to that email. He has 30 days to do that. Otherwise, you're going to assume it's moot at that point.

MS. VICARI: Yes, Your Honor.

THE COURT: And then we go from there.

I don't know who is going to be handling this case. I was called in at the last minute to see if I was available. I'm actually a retired judge on senior duty. So I don't know actually who this

case is going to be assigned to in the normal course of business, to give you a heads-up.

I will give a shout-out to Mr. Williford, staff attorney, very responsive, and did a lot of work on the case, got me educated a whole lot. I still have a long way to go. Don't we all?

So I'm going to leave it at that for the accelerated hearing. He is going to give you the response and then you-all can do the email back and forth to document everything.

Are you okay using email going forward?

MR. GLEASON: I prefer that.

THE COURT: Everything is documented when you come to court. Hopefully you don't have to keep coming to court, but as things unfold --

MR. GLEASON: Your Honor, this issue was filed because I was planning on doing a challenge of the election because of the multiple issues that I observed.

THE COURT: When you say "election," which election are you talking about?

MR. GLEASON: August 20th election.

THE COURT: The one that just happened?

MR. GLEASON: Yes.

THE COURT: When was the Complaint filed?

MR. GLEASON: It was filed on the day of the election.

THE COURT: Oh, okay.

MR. GLEASON: Based on massive issues that were identified that called into question the legality of many -- actually all of the Mail-in Ballots.

THE COURT: What would you like me to do right now in this accelerated hearing?

MR. GLEASON: I would like you to issue an Order to the defendants that they need to immediately provide me with the requested information once they have that signed statement from me.

THE COURT: I'm going to let that play out because I don't know what your response is going to be.

MR. GLEASON: I'm telling you right now, Your Honor, I'll send it and have it filed today.

THE COURT: And we can set another hearing as this case unfolds. You might be seeking to put out your own request for documents, set depositions, interrogatories.

I don't issue subpoenas. It comes from the clerk's office. If you want a subpoena or written

request to documents, you're entitled to all those things. I know you told me you're not a lawyer, but you're kind of held to the same rules that apply in discovery. But you're entitled to a request for production, interrogatories, depositions, the whole gambit of discovery in the litigation case.

So the case is still in the litigation mode. They apparently just got served. They've got so many days to give a response. And if you-all need to set hearings for the Court, then you can set hearings.

Emergency hearings are fairly stringent. The requirements for emergency hearings are -- it's pretty tough to get an emergency hearing. Expedited hearings is just a function of usually what judge and what's calendared, what's available.

Right now I'm going to leave it at that at the accelerated hearing. I'm going to wait for the Supervisor of Elections' Office to get your response and go from there. I know that's not all you're asking for here this morning, but that's about the best I can do right now given the time constraints.

MS. VICARI: Your Honor, just briefly, so within the Complaint, as I stated, there were two requests. We talked about the second request that was via email.

Is the Court going to address the other records request that's at Paragraphs 14 and 15 which was alleged to be a verbal request? And if so, Your Honor, we do have body cam footage of the request being made, body cam of the sheriff's office who was in the logic and accuracy testing room. It is a very short, verification of records from the sheriff's office to authenticate the video.

THE COURT: Let me ask this. Can you put those requests in writing and resubmit them?

MR. GLEASON: Yes, Your Honor.

THE COURT: Can you do that?

MR. GLEASON: Yes.

THE COURT: That way we don't have to start bringing in all this stuff --

MR. GLEASON: Yes, Your Honor.

THE COURT: All right. You can do that within the 30-day period?

MR. GLEASON: Yes, Your Honor.

THE COURT: Mr. Gleason is going to resubmit

it and put it all in writing, that way everything is documented and we don't have a lot of video and body cams and everything else you were talking about.

Sorry to have to cut you short, but I've got to keep the train kind of running here.

Before we leave, Mr. Gleason, anything else?

MR. GLEASON: No.

THE COURT: Obviously you put a whole lot of time and effort in this case, and I appreciate it and so has the defense, and Mr. Williford, our staff attorney, he knows.

Stay safe, stay healthy and I don't know who is going to be wearing the robe next time you come, but it probably won't be me. And you all will probably be happy about that.

Happy Labor Day weekend.

(The Proceedings concluded at 10:34 a.m.)

CERTIFICATE OF COURT REPORTER

STATE OF FLORIDA

COUNTY OF PINELLAS

I, KELLEY N. BLACK, RPR, FPR-C, do hereby certify that I was authorized to and did stenographically report the Proceedings held before The Honorable Peter Ramsberger; and that the foregoing transcript is a true and correct record of my stenographic notes.

I FURTHER CERTIFY that I am not a relative, employee, or attorney, or counsel of the parties, nor am I a relative or employee of any of the parties' attorney or counsel connected with the action, nor am I financially interested in the action.

DATED this 31st day of August, 2024, at Pinellas County, Florida.

Kelley N. Black, RPR

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Tab T – Transcript of August 29, 2024 Hearing: Counsel contradictions and misrepresentations.

Tab U – Transcript of September 19, 2024 Hearing: False “critical infrastructure” claims; improper sealing orders.

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON, a Florida Citizen, Elector and Candidate for Supervisor of Elections, Pinellas County, Plaintiff, vs. JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et al., Defendants.	Case No.: 24-003717-CI UCN: 522024CA003717 XXCICI

CHRISTOPHER GLEASON, Candidate for Supervisor of Elections, Pinellas County, Elector, Citizen, and Taxpayer, Plaintiff, vs. JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et al., Defendants.	Case No.: 24-003995-CI UCN: 522024CA003995 XXCICI

HEARING ON

Case No. 24-003717-CI: Status Conference Hearing

Case No. 24-003995-CI: Status Conference Hearing

and Defendant Julie Marcus' Motion to Determine the Confidentiality of Trial Court Records (Docket No. 41)

and Motion for Order Related to Plaintiff's Filing of Sensitive Information in Violation of Rule 2.425, Florida Rules of General Practice and Judicial Administration (Docket No. 42)

BEFORE: The Honorable Patricia A. Muscarella

DATE: Thursday, September 19, 2024

TIME: Commencing at 1:30 p.m.

PLACE: Pinellas County Courthouse
315 Court Street
Clearwater, Florida

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P R O C E E D I N G S

THE COURT: We are here on two cases today. We'll go on the record on Case No. 24-3995, Gleason versus Julie Marcus, Pinellas County Supervisor of Elections, and Pinellas County Canvassing Board.

We'll also go on the record in 24-3717. This is Christopher Gleason versus Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections, et al.

Who is here for the plaintiff?

MR. GLEASON: I am, Your Honor.

THE COURT: Mr. Gleason; right?

MR. GLEASON: Yes.

THE COURT: Thank you.

And for the defense?

MR. KAHN: Jared Kahn on behalf of Supervisor Marcus in Case 3995, the untitled contest of election.

MR. KLEIN: Jeff Klein, Your Honor, on behalf of the Pinellas County Canvassing Board, in case number ending in 3995.

MS. VICARI: Good afternoon, Your Honor. Kelly Vicari. And I'm here on Case 24-3717. I represent Julie Marcus, in her official capacity

as Pinellas County Supervisor of Elections; Defendant Dustin Chase, in his official capacity as Deputy SOE; and Matt Smith, in his official capacity as legal counsel to Supervisor of Elections.

THE COURT: Thank you so much.

Okay. So we are here to have a case management on both cases, as well as hear defendant's motion to determine certain filings as confidential.

So I would like -- Mr. Kahn, are you going to proceed?

MR. KAHN: Yes, Your Honor.

THE COURT: Okay.

MR. KAHN: Your Honor, I'd first draw your attention to the motion to determine confidentiality of trial court records.

Mr. Gleason has filed docket entry 18 as Exhibit G, Configuration Report. Pages 2 and 4 of 27, which was filed on September the 9th, contain confidential and protected information.

That information is protected under Florida Rule of Judicial Administration 2.420, Florida Statute 119.0725(2)(b), as well as Florida Statute 119.0725(2)(d).

Mr. Gleason has disseminated confidential and sensitive information related to critical infrastructure regarding elections.

This information is, in fact, designated by the United States Department of Justice as critical election infrastructure.

Furthermore, the Department of Justice has designated ES&S as a provider of confidential infrastructure. And for those reasons, Exhibit G should be protected as confidential.

THE COURT: Do you want to respond individually in each case, Mr. Gleason?

MR. GLEASON: Yes, Your Honor.

THE COURT: Go ahead.

MR. GLEASON: So --

THE COURT: We're talking about 3717 right now.

MR. KAHN: Your Honor, this is only as to 3995. These were exhibits to 3995.

THE COURT: 3995. I apologize.

MR. KAHN: Yes.

THE COURT: Mr. Gleason.

MR. GLEASON: So, Your Honor, confidential information or privileged information only remains that way as long as it's not in the public view

and not open to public disclosure.

And the information contained on page 2 and page 4 has been widely disseminated on the Internet and has also been all over social media and has been personally viewed on my own Substack and articles in the Miami Independent to the tune of over 2 million views.

So my understanding of protected and sensitive information is that if it is in the public view and it has been widely disseminated, then it is not, in fact, private and confidential.

With regards to the claim that this information is deemed critical election infrastructure and not subject to disclosure, I would argue that is absolutely not the case, insomuch as in my work throughout America, those configuration reports are routinely given to me by other -- by other election administrators in other states.

In particular in the state of Texas, where I have received everything that I have requested in its original electronic format, unaltered and unedited and unredacted.

And if, in fact, what the defense had claimed was true, Texas would not have given me all of

this information as part of public records requests. Furthermore, I had made multiple requests for public records amongst all 67 counties in Florida.

So, in order for information to be deemed critical election infrastructure, each piece of information has to be designated with a special number, and there has to be a special green folder, a special green sheet that delineates, and a log of all of that information that is deemed critical election infrastructure.

I have here a copy of ES&S's Electionware Deliver User's Guide, and this was obtained directly via public records request in Texas. Moreover, any information deemed critical election infrastructure has to be labeled as such.

And so even here within Florida, Attorney Kahn had mentioned or he had submitted a piece of paper that claimed that Clay County was the liaison for the state of Florida.

Now, I will tell you that Clay County had provided to me a report designated as a system log, also known as EL68A. This report was unlawfully withheld by Supervisor of Elections Julie Marcus.

Now, the issue here at hand ultimately is that there is an ongoing massive pattern of official misconduct in the Supervisor of Elections Office.

Now, according to Florida Statute 838.022, if a custodian of records withholds public records, to include election records, and it gives a party a benefit or it harms another party, and/or if it conceals, delays, prevents the transmission of information related to the commission of a felony within the county or governmental office, that is official misconduct.

And so what we see with the Pinellas County Supervisor of Elections Office, I had actually made a request for a copy of the green sheet and the classifications under the Critical Election Infrastructure Act, and they responded to me saying that they had no responsive records.

So if, in fact, what they claimed was true, there would have been a designation for that particular information.

Furthermore, the defense claims that VR Systems also falls into that category. Now, VR Systems is a software vendor that is also critical to the issues at play in this case. On election night, VR Systems crashed for the entire

state, it went down.

VR Systems is also the repository for a great amount of the vote by mail requests that were made unlawfully on June 23, 2024.

Now, there are three ways, Your Honor, that a request for a vote by mail ballot can be made. One is via telephone. Two is in person in writing.

MR. KAHN: Your Honor, I'm going to object at this point. We're here for -- we're here due to record -- or we're here due to confidential information being filed. The information that we're talking about is specifically the information in Exhibit G, pages 2 and 4.

It has no bearing on the information that Mr. Gleason is incorrectly presenting to the Court and misunderstanding. And it's solely related --

THE COURT: It doesn't really relate to the confidentiality issue before me today, that I can tell.

MR. GLEASON: Well, Your Honor, it does, because he's -- they're claiming that this information in Exhibit G is -- falls under protected critical election infrastructure information. And I'm saying to you that the

disclosure of a machine configuration report does not fall under that category of information.

THE COURT: Did you file anything --

MR. GLEASON: What's that?

THE COURT: -- as to this motion?

MR. GLEASON: Not yet, Your Honor. I believe I have 10 days, don't I?

THE COURT: If you're asking me, I -- it's been filed for I don't remember how long, but yes, the hearing has to be within 10 days. That's why we're here today.

MR. GLEASON: Okay.

THE COURT: So I would assume that you would file something with your position that would be helpful to the Court.

Number two is, I was looking at the motion on 3995. And A is with respect to Exhibit G. And I'm just wondering if all these other ones listed in the motion, are you requesting the Court to also redact all that.

MR. KAHN: So at this point, as far as the motion to determine confidentiality, we're looking to get Exhibit G determined to be confidential and locked.

Going on to the other motion, that's not

necessarily dealing with confidential information, but sensitive information.

Mr. Gleason has disseminated Pinellas County voters driver's -- complete driver's license numbers. He's provided untruncated email addresses. He's provided complete phone numbers.

In some instances, including Ms. Chamberlain, who I believe may be here, he provided a portion of her Social Security number. He provided -- he provided --

THE COURT: I've read it.

MR. KAHN: -- tremendous amounts of information.

THE COURT: So -- so I'm asking you, I guess, is there a difference in your request for Exhibit G versus everything else?

MR. KAHN: For Exhibit G, I'd like that to be locked as confidential. For the rest of the exhibits, we would ask that they be locked, and we would ask that the burden be put upon Mr. Gleason to expend the time and effort to properly go through his documents and ensure that they're in compliance with Florida law, and that the citizens of this county, including people who are here in this room today, sensitive and confidential

information is protected.

THE COURT: Okay. I just wanted to clarify because it's all listed as A, B, C, D. It's a little bit -- it was unclear as to what you were asking the Court to do today, so I apologize for asking that question.

MR. KAHN: Yes. And, Your Honor, as far as -- as far as the second motion was concerned, Mr. Gleason filed such a large voluminous amount of information --

THE COURT: And we're on 3995; correct?

MR. KAHN: On 3995, yes.

THE COURT: Okay. I just want to be clear. We'll worry about that one --

MR. KAHN: With the exhibits that have been filed --

THE COURT: -- when we get there. On 3717?

MR. KAHN: On 3717, we don't have any issues regarding confidentiality because there's been -- there's been no exhibits filed. So as far as confidentiality and sensitive information, that's exclusive to 3995.

THE COURT: Well, there is a motion on 3717 as well.

MS. VICARI: Yes, Your Honor. There's a

Motion to Dismiss that needs to be scheduled for hearing.

THE COURT: Okay. There's also a Motion for Confidential Information. Let me find my paperwork here. But I believe it's as to -- they were both -- I apologize.

MS. VICARI: Okay.

THE COURT: They were both 3995. I apologize. I thought it was the other one. Okay. Never mind.

MR. KAHN: Yes, Your Honor. And for the second motion, which was related to the filing of sensitive information, the things that were listed in there from A through R lists the things that I was able to determine as being either confidential or sensitive in the review that I was able to have.

But due to the fact that Mr. Gleason, although untimely, filed a contest of elections, we were required to respond to that within 10 days. And during that period, my focus was more on responding to his document. And I felt that it was more Mr. Gleason's job to protect the confidential and sensitive information that he's disseminating to the public.

THE COURT: Okay. So I apologize, Mr. Gleason. So let's go back to Exhibit G. You were responding to that, but you haven't filed anything for the Court's review. So we are having the hearing. I don't want to do anything that's not complying with the law at the hearing today. Would not be able to give you time since we've had the hearing consistent with the schedule required by the statute.

MR. KAHN: And Your Honor, just for -- just for the Court's own knowledge, I personally filed this motion on the 13th at 4:59 p.m. I personally sent Mr. Gleason to his three email addresses on file, even though they have not been designated, copies of the motion. I mailed the motion to his home.

When I reached out to your judicial assistant and got permission to set this hearing, which would have been on September 16 at roughly 2:30, I had Mr. Gleason included on those communications. I did send him the notices of hearing. So he has been aware of today's hearing.

THE COURT: So I guess -- are you trying to tell me that 10 days from the election, 10 days -- I'm a little bit at a loss what I'm required to

do.

So we have the hearing, which is the 10 days for confidential information. Are you saying that there's no other responses, that that's not allowed under the rules, or what?

MR. KAHN: I'm saying that ultimately the clerk has this information on the lockup that will end on the 21st. So after the 21st of September, for the information to remain confidential or protected, we would need a ruling.

THE COURT: So that's two days from today.

MR. KAHN: Correct.

THE COURT: Gotcha.

MR. KAHN: So that's what we were hoping to take care of today.

In addition to taking care of those matters, in 3995 Supervisor Marcus has filed an answer as well as a Motion to Dismiss. We would be asking for a hearing date on the Motion to Dismiss, anticipating that Mr. Gleason is going to object to that motion being ruled on based on written submission.

THE COURT: Okay. So let's get to the Motions to Dismiss at another time. Let's do this confidential order and follow what I'm supposed to

do.

So, Mr. Gleason, I don't have anything other than your argument today.

MR. GLEASON: I can have -- I can have -- I can have a written response to you by the end of today, Your Honor, with regards to this.

However, like I said, it is very well -- it's a very well-known legal -- there's quite a lot of case law that once something is out in wide dissemination, it's not subject to confidentiality. So I would say --

THE COURT: If you can respond by the end of the day --

MR. GLEASON: I will, Your Honor.

THE COURT: -- with your position, that would be great.

MR. GLEASON: Yes.

THE COURT: I will do my best. If you want to respond to that, Mr. Kahn, by close of business -- it's getting kind of tight, isn't it? As soon as you can, that would be great.

I would like proposed orders both ways.

MR. KAHN: Yes, Your Honor.

THE COURT: And anything else, Mr. Gleason, on the motions to remain confidential as to

Exhibit G?

MR. GLEASON: So them trying to seal all of Exhibit G is highly problematic, especially as it relates to other portions of my complaint regarding the use of voting systems with certifications that are void in their entirety, and with using voting systems that are connected to the Internet. So that's also a rather large issue.

THE COURT: Well, that's a different issue than whether it remains confidential or not.

MR. GLEASON: Yes. So I would say --

THE COURT: Is that a yes or no? Because we're on the record, so --

MR. GLEASON: I guess I don't understand what you're asking, Your Honor.

THE COURT: Whether some voting machines were connected to the Internet is not relevant to the confidentiality issue before me today.

MR. GLEASON: Well, it actually is, because the confidentiality issue is the configuration report that shows that there's a modem attached and that it is active, and that is certainly materially relevant to the case at hand.

And that also is grounds for it not to be held

confidential because this is a significantly important material fact to the illegal administration of elections using voting systems that are connected to the Internet.

THE COURT: Okay. So you're going to include whatever your position is on it --

MR. GLEASON: Yes, Your Honor.

THE COURT: -- in writing by the end of the day?

MR. GLEASON: Yes, Your Honor.

THE COURT: Thank you.

And as to everything else as to Exhibit G, there's a series of unredacted emails and phone numbers and driver's licenses that would need to be consistent with the law. So you would agree with those?

MR. GLEASON: I can take care of that, Your Honor.

THE COURT: Okay. How many days?

MR. GLEASON: By Monday?

THE COURT: Okay.

MR. GLEASON: I do have one thing to bring up as far as that goes, Your Honor. Again, if things are materially related to an issue, then those rules -- it's my understanding that those rules

don't apply.

And, in particular, the information that the defense is claiming as confidential with regards to phone numbers and email addresses, those are actually public records. And those email addresses and phone numbers are those of public officials. And those are their official work emails and their official work telephone numbers.

And it's my understanding that government employee phone numbers and email addresses are not exempt from disclosure. And they are, in fact, public records, and these public records are, again, relevant to who is knowingly and willingly participating in what's going on.

THE COURT: Well, that's exactly why I think it should be confidential, because the employees --

And Mr. Khan, I don't know what the law is, but I would imagine that the official email for the Supervisor of Elections who is a party is one thing, but generally other witnesses or people that you think should be a witness in this case, those should not be disseminated. Mr. Kahn?

MR. KAHN: Yes, Your Honor. And there are untruncated email addresses that belong to

individuals outside of government. And to your point --

THE COURT: I don't know.

MR. KAHN: -- Rule 2.420 deals with specifically the issue. And it does indicate that email addresses that are being provided must be truncated.

MR. GLEASON: And there are exemptions under section (b) under 2.420. And if Attorney Khan would continue scrolling down the page of that rule, he will see that what I -- what I have is, in fact, a valid exemption to that rule.

THE COURT: So you didn't say any of that to me in today's hearing. So you're claiming an exemption for the emails.

MR. GLEASON: Yes, Your Honor.

THE COURT: So you're either going to redact it and refile, I think you said by Monday, or any things that you object to that you think comes under an exemption, you will also bring that to the Court's attention.

I am going to, for today's purposes, because Monday is soon, today is the 19th, the 21st would be Saturday. And so what I'm going to do is, without prejudice, seal everything for today so we

don't have a disclosure that is not allowed by law, but to be revisited, I'm going to say without prejudice, based on whatever you're going to send the Court by tomorrow or today, I guess it was today, and a response on what you're redacting by Monday and what you are objecting to by Monday.

So I just -- this is a new area of law for me. So is that within my available remedies for today?

MR. KAHN: I believe so, Your Honor. You issuing an order today would instruct the clerk of the court to keep those documents locked.

And then in the event that you were to revisit your order and change it at a later time, I believe that that would be as to the new filings that Mr. Gleason would do, and that should resolve the problem.

THE COURT: Why don't we say until further order of the Court, that without prejudice, until further order of the Court.

MR. GLEASON: But, Your Honor, the information is on the Internet. It's widely --

THE COURT: You can argue that, sir.

MR. GLEASON: Okay. All right.

THE COURT: Does that suit you that you are --

So the order today is that the clerk is

directed to maintain all of these confidential without prejudice until further order of the Court.

That Mr. Gleason is going to respond to his objection to Exhibit G, if I'm saying that right, in writing, by close of business today. Mr. Kahn is welcome to respond to that.

The redactions, you agreed to file the redactions as per the law, but you are claiming some exemptions on some of these, and so I'd like to see the exemptions.

MR. GLEASON: Okay.

THE COURT: So I will look at everything that both sides file and determine if we need another hearing on this or not.

MR. GLEASON: Okay.

THE COURT: And I would appreciate if both of you would prepare the proposed order for my review based on the subsequent filings in this case on the confidentiality issues.

MR. KAHN: Just for clarification, Your Honor, for the purposes of today, will you be doing your own order, or do you need something as well?

THE COURT: I need an order for today. Run that by Mr. Gleason.

Does that suit you, sir?
MR. GLEASON: Yes, Your Honor.
THE COURT: Thank you.
MR. KAHN: Your Honor, just a housekeeping matter.
THE COURT: Okay.
MR. KAHN: As far as Case No. 3717 --
THE COURT: Yes.
MR. KAHN: -- Mr. Gleason did file a notice of designation of email address, which allows him to be served through the e-portal. However, in 3995, that's not been done yet. If we could have Mr. Gleason do the designation of email address so that we can serve him future documents through the e-portal, we would greatly appreciate it.
THE COURT: Is that okay with you, sir?
MR. GLEASON: Yes, Your Honor.
THE COURT: Okay. Thank you.
All right. I think that solves the issues that were set for today for hearing. Let's talk about other motions that have been filed and see where we are.
As to the motions of 3717, I would like written submissions. You don't have to do written submissions, but I still need a response before

the hearing. So I will look at my calendar.

Mr. Gleason, are you going to object as to written submissions on any Motions to Dismiss? Normally, that's how I do them.

MR. GLEASON: Yes, Your Honor.

THE COURT: Okay. So I still am going to require you to file a written response. So both of those -- those motions have been filed. How many days would you like to file the written response?

MR. GLEASON: Tuesday?

THE COURT: Okay.

MR. GLEASON: Or 10 -- yeah, yeah.

THE COURT: You can have more time, if you'd like.

MR. GLEASON: Next Wednesday?

THE COURT: Okay. That's fine.

So Mr. Gleason will respond to all the Motions to Dismiss in both cases. Is there anything else pending that I don't know of?

MS. VICARI: Your Honor, the plaintiff, Mr. Gleason, filed a Motion for Reconsideration of the Court's findings --

(Telephone ringing.)

THE COURT: Whoever has their phone on, would

you please turn that off.

By the way, there's no recording. I don't know if anyone is recording this in the audience, but there is no recording in court proceedings, only the official record.

Yes, go ahead.

MS. VICARI: Yes, Your Honor.

Mr. Gleason filed a Motion for Reconsideration of the findings that the Court made at the accelerated Public Records Act hearing that we had on August 29 that was before Senior Judge Ramsberger. We don't have a written order. But I've already filed a response on behalf of my clients.

And there's also a Motion for Sanctions that was filed by Mr. Gleason that I have also filed a response to. So those motions are also outstanding, Your Honor.

THE COURT: Okay. Thank you for letting me know.

So I did look at that order. It wasn't very comprehensive. So since I didn't hear that, let me look at all the pleadings, everything that's filed. And let's look at the calendar.

How much time do you think we would need,

Mr. Gleason?

MR. GLEASON: What's that, Your Honor?

THE COURT: On the Motions to Dismiss cases. Do you have an idea how much time you would think we would need? I will review all the written documents prior to the hearing, so you know. It's a non-evidentiary hearing. It's only about argument on Motions to Dismiss.

MR. GLEASON: So, Your Honor, there was another motion. There was a motion that I filed today, and that was a Motion for Recusal for Your Honor.

THE COURT: Yes, sir, I reviewed those and denied both of them. That's why we're having the hearing today.

MR. GLEASON: Okay.

THE COURT: Anything else?

MR. GLEASON: No.

THE COURT: How much time do you think we would need? Will we do both Motions to Dismiss at the same time?

MR. KAHN: Your Honor, we would be okay with doing both Motions to Dismiss at the same time. As far as the public records case is concerned, that's the one that's 3717, I anticipate that that

will likely take a little bit longer than the contest of elections.

THE COURT: Okay.

MR. KAHN: I would imagine that if we -- if we had roughly one hour, I think that that could take care of -- I think that could take care of everything from the supervisor side as far as Mr. Gleason's motions, our motions, and both cases.

With that being said, I don't know how long Mr. Gleason would go, and I don't want to -- I don't want to cut his time short.

THE COURT: Mr. Gleason?

MR. GLEASON: Yes, Your Honor.

THE COURT: I'm trying to set the Motions to Dismiss and figure out how much time I need to reserve on my calendar.

MR. GLEASON: Maybe hour and a half?

THE COURT: Okay. What if we did something like I have October 10th afternoon.

MS. VICARI: I'm available, Your Honor.

THE COURT: Okay.

Mr. Gleason, are you available?

MR. GLEASON: Yes, Your Honor.

MR. KLEIN: I'm available as well, Your Honor.

MR. KAHN: Your Honor, what's the date that was just mentioned again?

THE COURT: Looking at October 10th.

MR. KAHN: On October 7th is the day that mailed out, sent out, so I would be fine with the 10th, although I think that that might frustrate the purpose that Mr. Gleason is here for. No objection to the 10th, but I'm just trying to disclose to the Court.

THE COURT: I understand.

MR. GLEASON: We should probably do it before the vote by mail ballots go out, Your Honor.

THE COURT: Okay. I have no time the week of the 29th, 30th. And I'm at a conference, judges' conference next week. So Thursday is a holiday that week of the 30th.

I'm willing to do it at lunch two different days on the week of the 30th. I usually work through lunch anyway. So do we want to set one or as much as we can get through in an hour and then as much as we can get through on a second day. So I'm proposing probably the 1st and the 2nd at noon.

Mr. Gleason, are you available?

MR. GLEASON: Yes, Your Honor.

THE COURT: Okay. Is everyone else available?
MR. KAHN: Your Honor, we have a -- we both have available the 1st. However, on the 2nd, I have a conflict at 1:00 p.m.
Are you available on the 2nd?
MS. VICARI: I'm available on the 2nd. So if we wanted to separate the cases, Your Honor, we could hear 24-003717 on Wednesday, October 2nd, at noon.
THE COURT: I would anticipate we just go until the hour.
MS. VICARI: Okay.
THE COURT: And then if we need the extra time, we'll do that.
MS. VICARI: Okay. So I'll just be prepared on the 1st and then --
THE COURT: Yes.
MS. VICARI: Okay.
THE COURT: Is that okay with you, Mr. Gleason?
MR. GLEASON: Yes, Your Honor.
THE COURT: Okay. Who's going to do the notice of hearing for me?
MR. KAHN: Would you like the notice of hearing to indicate that there will be a hearing

both on 10/1 and 10/2 from 12:00 until 1:00?

THE COURT: Yes, please.

MR. KAHN: I'll get it taken care of, Your Honor.

THE COURT: Thank you. With the idea that if we hear 3995 first, that would be great, or coordinate it so we can do that.

MR. KAHN: Your Honor, there was one other matter that did not get mentioned. Mr. Klein, who's sitting beside me, represents the Pinellas County Canvassing Board in 3995, and I believe he has an outstanding motion.

MR. KLEIN: We've also -- I think, Judge, you're aware we've also filed a Motion to Dismiss, for the most part the same supervisor of elections, but would like to notice it to be heard on the same day. And we'll be joining in their argument, I think, for most of the entire thing.

THE COURT: No objection; correct, Mr. Gleason?

MR. GLEASON: No. Thank you, Your Honor.

THE COURT: All right. Anything else, Mr. Gleason?

MR. GLEASON: No, Your Honor. Actually, let's see, there was -- I'd like to file a -- I'd also

like to get a pretrial motion for discovery filed.

THE COURT: Okay. You can file whatever you want, and we would add -- let's add a CMC to the dates so that if anything else comes up and we need to schedule it, we can take a look at that.

Is that okay? Does that help you, Mr. Gleason?

MR. GLEASON: Yes, Your Honor.

THE COURT: Okay.

MR. KAHN: Do we have a date for it?

THE COURT: The same --

MR. KAHN: You're saying add a case management conference to the 1st and 2nd?

THE COURT: To the existing 1st and 2nd, yes.

MR. KAHN: Understood.

THE COURT: Okay. Thank you. Anything else?

MR. GLEASON: No, Your Honor.

THE COURT: Okay. We are concluded and off the record.

(End of proceedings at 2:18 p.m.)

CERTIFICATE OF TRANSCRIBER

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COUNTY OF PINELLAS)

I, Donna W. Everhart, RMR, RPR, CCR, for Maxa Enterprises, Inc.:

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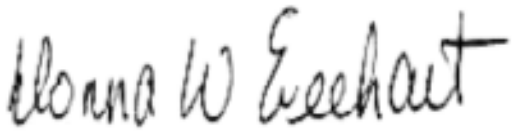
I FURTHER CERTIFY I am neither an attorney or counsel of any of the parties hereto, nor a relative or employee of any attorney or counsel employed by the parties hereto, nor financially interested in the event of said cause.

DATED this 27th day of September, 2024.



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Tab V – Motion to Disqualify County Attorneys: Demonstrates unlawful taxpayer-funded defense.

Filing # 218776942 E-Filed 03/13/2025 10:30:04 PM

DISTRICT COURT OF APPEAL OF FLORIDA
SECOND DISTRICT

CASE NO.: 2D2024-2687
(Lower Tribunal Case No.: 24-003717-CI)

CHRISTOPHER GLEASON,

Appellant,

v.

JULIE MARCUS, et al.,

Appellees.

APPELLANT'S MOTION TO DISQUALIFY DEFENSE COUNSEL FOR UNLAWFUL USE OF PUBLIC FUNDS

COMES NOW, Appellant Christopher Gleason, pro se, pursuant to Florida Rule of Appellate Procedure 9.040(c) and Florida Statutes, and moves this Court to disqualify defense counsel—Jared N. Kahn and Kelly L. Vicari of the Pinellas County Attorney's Office—representing Appellees Julie Marcus and others, for unlawful use of taxpayer funds. Florida law prohibits public officials from using county-funded counsel when accused of fraud, felonies, and official misconduct, as here. This motion is supported by the Petition for Writ of Mandamus (pending) and Motion for Judicial Notice (pending).

I. INTRODUCTION AND FACTUAL BASIS

1. Appellant, a candidate and taxpayer, alleges Appellees committed election fraud involving 415,728 illegal vote-by-mail ballots (Petition, ¶¶ 4-6; Exhibit O), official misconduct (§ 838.022, Fla. Stat.), and felonies (e.g., 18 U.S.C. §§ 1341, 1343), prompting 220 grand jury requests (Petition, ¶¶ 7-8; Exhibits E, F).

2. County attorneys Kahn and Vicari, employed by the Pinellas County Attorney's Office (Exhibit G, Employment Record), defend Appellees using public funds, despite these acts falling outside lawful duties (§ 111.07, Fla. Stat.).

3. Florida law bars such representation, necessitating disqualification to protect public resources and ensure ethical proceedings.

II. LEGAL BASIS FOR DISQUALIFICATION

A. Florida Law Prohibits Taxpayer-Funded Defense

4. **§ 111.07, Fla. Stat.**: Limits public-funded defense to officials sued "in their official capacity" for "act[s] or omission[s] aris[ing] out of and in the scope of… employment" in good faith. Fraud (415,728 ballots), felonies, and misconduct exceed this scope (*Nuzum v. Valdes*, 455 So. 2d 915, 917 (Fla. 1st DCA 1984)).

5. **AGO 77-98**: "Public funds may not be used to defend officials charged with misconduct or crimes" (AGO 77-98, Sept. 13, 1977).

6. **AGO 91-85**: "Legal representation at public expense is improper where fraud or abuse of power is alleged" (AGO 91-85, Nov. 19, 1991).

7. **Caselaw**:

    - *Nuzum v. Valdes*, 455 So. 2d at 917: Ultra vires acts (beyond authority) bar public defense.

    - *State ex rel. Brautigam v. White*, 138 So. 2d 373, 375 (Fla. 1961): Misuse of funds for unlawful acts is malfeasance.

    - *Thompson v. Dade County*, 212 So. 2d 433, 435 (Fla. 3d DCA 1968): Defense limited to good-faith acts.

B. Ethical Conflicts

8. **Rule 4-1.7, Fla. Bar**: County attorneys cannot represent Appellees in personal-capacity fraud claims while serving the public, creating a conflict (*Young v. Achenbauch*, 136 So. 3d 575, 580 (Fla. 2014)).

9. **Rule 4-1.11**: Defending misconduct breaches duties to the public as former client (*State v. Fitzpatrick*, 464 So. 2d 1185 (Fla. 1985)).

C. Criminal Exposure

10. Pending grand jury requests (Petition, ¶¶ 7-8) and allegations (18 U.S.C. §§ 1341, 1343; § 838.022, Fla. Stat.) preclude public defense until resolved (*Lomax v. City of Miami*, 964 So. 2d 156, 158 (Fla. 3d DCA 2007)).

III. ANTICIPATING DEFENSE ARGUMENTS AND RESPONSES

11. **"Official Capacity Entitlement"**: False. Fraud and felonies are not official acts (§ 111.07; *Nuzum*, 455 So. 2d at 917).

12. **"Routine Civil Defense"**: Misleading. Criminal fraud (Petition, ¶¶ 14-16) exceeds negligence; public funds are barred (AGO 91-85).

13. **"Good-Faith Actions"**: False. 415,728 illegal ballots and grand jury inaction (Motion for Judicial Notice, ¶¶ 7-8) show ultra vires misconduct (*Brautigam*, 138 So. 2d at 375).

14. **"No Conflict"**: Untrue. County attorneys' dual role violates Rule 4-1.7 (*Young*, 136 So. 3d at 580).

15. **"Motion Untimely"**: Baseless. Fraud evidence emerged in 2025 filings (Petition, March 12); timely raised now.

IV. RELIEF REQUESTED

WHEREFORE, Appellant requests:

1. Disqualify Jared N. Kahn and Kelly L. Vicari as counsel for Appellees;

2. Order Appellees to retain private counsel at their expense;

3. Declare taxpayer-funded representation unlawful under § 111.07;

4. Stay proceedings pending compliance (Rule 9.310(a));

5. Award costs per § 57.105, Fla. Stat., if defense persists;

6. Grant further relief as just.

Dated: March 13, 2025

/s/ Christopher Gleason

Christopher Gleason
1628 Sand Key Estates Court
Clearwater, FL 33767
Phone: 727-480-2059
Email: cpgleason72@gmail.com , gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I certify that a true copy was furnished via E-Filing Portal on March 13, 2025, to: Clerk, Second District Court of Appeal; Clerk, Sixth Judicial Circuit, Pinellas County; Jared N. Kahn, Esq. (jkahn@pinellas.gov); Kelly L. Vicari, Esq. (kvicari@pinellas.gov); FSE Inc. (via registered agent or general counsel).
/s/ Christopher Gleason

CERTIFICATE OF COMPLIANCE

This petition complies with Rule 9.045(e), using 14-point Times New Roman.
/s/ Christopher Gleason

EXHIBITS

- **Exhibit G**: Pinellas County Attorney's Office Employment Record (or affidavit confirming Kahn/Vicari's status).

EXHIBIT G:

Florida Bar Records Confirming Kahn/Vicari's status

as Pinellas County Employed Attorneys

MEMBER PROFILE

DIRECTORIES

Lawyer Directory

Authorized House Counsels

Certified Foreign Legal Consultants

Law Faculty Affiliates

Florida Registered Paralegals

Courts

Legal Groups

Judicial Nominating Commissions

Jared Douglas Kahn

Member in Good Standing | Eligible to Practice Law in Florida

Bar Number:	105276
Mail Address:	Pinellas County Attorney's Office 315 Court St Clearwater, FL 33756-5165 Office: 727-464-3354
Email:	jkahn@pinellas.gov
Personal Bar URL:	https://www.floridabar.org/mybarprofile/105276
vCard:	
County:	Pinellas
Circuit:	06
Admitted:	09/27/2013
10-Year Discipline History:	None
Law School:	John Marshall Law School
Sections:	City, County & Local Govt Law Trial Lawyers
Practice Areas:	City/County/Local Government Civil Trial Criminal Trial
Federal Courts:	U.S. Court of Appeals for the Eleventh Circuit U.S. District Court, Middle District of Florida U.S. District Court, Northern District of Florida U.S. District Court, Southern District of Florida
State Courts:	District Of Columbia
Firm:	Pinellas County Attorney's Office
Firm Size:	21-50
Firm Position:	Government attorney

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Florida Registered Paralegals

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Legal Groups

Judicial Nominating Commissions

Kelly Lynn Vicari

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:	88704
Mail Address:	Pinellas County Attorney's Office 315 Court St Clearwater, FL 33756-5165 Office: 727-464-3354 Cell: 727-464-3354 - No Text Messages
Email:	kvicari@pinellascounty.org
Personal Bar URL:	https://www.floridabar.org/mybarprofile/88704
vCard:	
County:	Pinellas
Circuit:	06
Admitted:	04/14/2011
10-Year Discipline History:	None
Law School:	Florida Coastal School of Law, 2010

Board Certifications:

Area	Year
City, County and Local Government Law	2019

Sections:	City, County & Local Govt Law
Practice Areas:	City/County/Local Government Civil Litigation Workers' Compensation/Defense
Federal Courts:	Florida Middle District Bankruptcy Court U.S. District Court, Middle District of Florida U.S. District Court, Northern District of Florida
Firm Position:	Government attorney

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Tab W – Motion to Disqualify Defense Counsel for Unlawful Funding: Confirms misuse of public funds.

Filing # 221986647 E-Filed 04/29/2025 09:23:43 AM

IN THE SECOND DISTRICT COURT OF APPEAL
STATE OF FLORIDA

CHRISTOPHER GLEASON

Appellant/Petitioner,

vs.

JULIE MARCUS, et. al.,

Appellees/Respondents

Case No. 2D2024-2687; 2D2024-2688

L.T. Case No. 522024CA003717; 522024CA003995

AMENDED AND SUPPLEMENTED MOTION TO DISQUALIFY COUNTY ATTORNEYS AND BAR USE OF TAXPAYER FUNDS FOR DEFENSE

COMES NOW, Appellant Christopher Gleason, pro se, and respectfully moves this Honorable Court to disqualify Attorneys Kelly Vicari, Jared Kahn, Jeffrey Klein, and all other attorneys from the Pinellas County Attorney's Office from representing Appellees in this matter, and to prohibit the use of public funds for their defense. This motion is based on disqualifying conflicts of interest, ethical violations, unlawful public expenditures, and structural due process violations arising from an alleged vote-by-mail (VBM) fraud scheme. The motion is brought pursuant to Florida Rule of Appellate Procedure 9.300; Florida Statutes §§ 111.07, 104.0616, 104.13, 838.022, 97.0585, 119.07; 18 U.S.C. §§ 1341, 1343; 52 U.S.C. §

20511; Florida Rules of Professional Conduct 4-1.7, 4-3.7, 4-1.10, 4-3.4, 4-8.4; and controlling case law.

I. FACTUAL BASIS FOR DISQUALIFICATION AND RELIEF REQUESTED

1. On June 23, 2024, 219,673 VBM ballots were illegally requested in Pinellas County, followed by 196,055 on September 9, 2024, without the voter having provided the statutory required identification verification upon request, violating Fla. Stat. § 101.62(1)(b), as evidenced by Florida Division of Elections VBM reports (Exhibit B, EXHIBITS A_Q.pdf; Exhibit B, attached). This mass-scale fraud undermines the 'right to vote' and 'equal protection' in the 'manner of its exercise,' per *Bush v. Gore*, 531 U.S. 98, 104-05 (2000), and necessitates disqualification and transparency.

2. These mail ballot requests included ballots for one unprotected voter, Jeffrey Klein, whose record was misused as part of systemic Florida Voter Registration System (FVRS) manipulation, and two protected voters, County Attorney Jared Kahn and Branden M. Vicari, the husband of County Attorney Kelly Vicari, as shown in VBM reports (Exhibit B, attached). A marriage record confirms Vicari's spousal connection (Exhibit A). Due to their protected status under Fla. Stat. § 97.0585, Kahn and Vicari were procedurally unable

to request VBM ballots online, as confirmed by a screenshot of the protected voter lock on the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov, Exhibit C, Exhibit G) and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf).

3. The unauthorized VBM requests, flagged as "N/N" (no ID provided) includes a Sunday submission on June 23, 2024, when the Supervisor of Elections' office was closed (Exhibit C, EXHIBITS A_Q.pdf). This constitutes prima facie evidence of and internal control override of election system fraud protections, false entry into official election records, and VBM fraud, as detailed in Appellant's affidavit (Exhibit D, attached). The "N/N" status and Sunday submission refute claims of legitimate requests, as no authorized mechanism existed for these submissions.

4. Attorneys Kahn and Klein, who represent Appellees, are material witnesses to, victims of, participants in, and/or beneficiaries of the alleged election fraud, as their voter records were misused (Exhibit B), creating disqualifying conflicts under Rule 4-3.7 (lawyer as witness) and Rule 4-1.7 (personal interest), Florida Rules of Professional Conduct. Their roles as government attorneys at the

Pinellas County Attorney's Office are confirmed by Florida Bar profiles (Exhibit F).

5. Attorney Vicari, whose husband Branden M. Vicari was also affected (Exhibits A, B), is personally entangled in the misconduct, creating a direct and substantial conflict of interest due to her spousal relationship. See *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009).

6. The County Attorneys sought to seal all exhibits, including official election records, VBM reports (Exhibit B) and publicly available public records and material widely available on the internet, to conceal any evidence of fraud implicating defendants, themselves, Vicari's husband, and judicial officers (Exhibit O, EXHIBITS A_Q.pdf), as evidenced by Jared Kahn's email and draft sealing order (Exhibit E, Pages 21-22). The resulting court orders (Exhibit E, Pages 23-27), granted by Judge Patricia Muscarella, are overbroad, encompassing non-exempt records without specific exemptions, violating Fla. Stat. § 119.07. This demonstrates bad faith under Fla. Stat. § 111.07, as *Times Publishing Co. v. Burke*, 375 So. 2d 297, 300 (Fla. 2d DCA 1979), and *Wait v. Florida Power & Light Co.*, 372 So. 2d 420, 424 (Fla. 1979), mandate narrowly tailored restrictions.

7. The Supervisor of Elections' office obstructed lawful requests for forensic audit data, claiming production of the requested data would take 19,000 hours to complete (Exhibit N, EXHIBITS A_Q.pdf), displaying a pattern of concealment consistent with the sealing effort (Exhibit E), implicating internal use of override credentials to falsify records, and establishing willful and knowing prima facie evidence of Official Misconduct a violation of 838.022 F.S.

8. Multiple judicial officers, including trial judges and assistants, had their protected VBM statuses overridden (Exhibit O), as corroborated by the VBM reports and protected voter lock system in place (Exhibits B, C), indicating a systemic misconduct reaching the judiciary. The sealing orders by Judge Patricia Muscarella (Exhibit E, Pages 23-27), potentially influenced by conflicted attorneys (Exhibits B, F), further taint the tribunal. This entanglement violates the *'basic requirement of due process'* for a *'fair trial in a fair tribunal,'* as held in *In re Murchison*, 349 U.S. 133, 136 (1955), and *Berger v. United States*, 295 U.S. 78, 85 (1935), necessitating recusal to prevent *'even the probability of unfairness.'*

9. This widespread misconduct establishes a cascade conflict, a systemic failure and structural error where attorneys,

election officials, and judicial officers are entangled as victims of, witnesses to, and/or participants, and/or beneficiaries of the same fraud, rising to a structural due process violation that dwarfs the structural errors per *Rogers v. State*, 630 So. 2d 513 (Fla. 1993), and aligns with *Williams v. Pennsylvania*, 579 U.S. 1, 8-9 (2016), which held '*an unconstitutional potential for bias*' creates a structural defect, and (*Young v. United States*, 481 U.S. 787, 803-04 (1987)), requiring disqualification for conflicted counsel.

II. VIOLATIONS OF FLORIDA LAW, FEDERAL LAW, AND BAR RULES

10. Under F.S. § 111.07, public officials are not entitled to taxpayer-funded defense if they act in bad faith or outside their duties. The County Attorneys' sealing of public VBM reports (Exhibit E) and representation, despite personal entanglement (Exhibits A, B, F), demonstrate bad faith, disqualifying the use of public funding. See *Thornber v. City of Fort Walton Beach*, 568 So. 2d 914 (Fla. 1990) and *Lomax v. City of Miami*, 977 So. 2d 677, 679 (Fla. 3d DCA 2008), which held that Fla. Stat. § 111.07 does not authorize funding for bad-faith actions that '*do not serve a public purpose.*'

11. The unauthorized VBM requests for Kahn, Klein, and Vicari's husband (Exhibit B), which has been confirmed as an

impossibility for protected voters, as shown by the protected voter lock on the Supervisor of Elections' website (Exhibit C, Exhibit G), violate F.S. §§ 104.0616 (VBM fraud), 104.13 (false returns), and 838.022 (official misconduct), as well as 18 U.S.C. §§ 1341, 1343 (wire/mail fraud) and 52 U.S.C. § 20511 (federal election fraud).

12. The override of voters with protected status (Exhibits A, B, C, G), is in violation of Fla. Stat. § 97.0585, because confidential voter records were accessed without authorization, constituting:

(a) A civil claim under Fla. Stat. § 119.07 for record manipulation, exacerbated by sealing (Exhibit E);

(b) A criminal charge under Fla. Stat. § 104.13 for false returns;

(c) A violation of F.S. § 838.022 for official misconduct;

13. The sealing effort (Exhibit E, Pages 21-27) violates Fla. Stat. § 119.07 by obstructing access to non-exempt VBM reports (Exhibit B), ignoring redaction options under Fla. Stat. § 119.07(2)(b), and demonstrating an intent to conceal fraud, as evident in Jared Kahn's email (Exhibit E, Page 21) which sought to seal all exhibits despite discussing only Exhibit G. This disqualifies the use of public funding for attorneys under Fla. Stat. § 111.07, and violates Rule 4-

8.4 (misconduct). *Times Publishing Co. v. Burke*, 375 So. 2d 297, 300 (Fla. 2d DCA 1979), mandates that restrictions be '*narrowly tailored*,' and *Wait v. Florida Power & Light Co.*, 372 So. 2d 420, 424 (Fla. 1979), emphasizes the public's right to inspect records, rendering the sealing order impermissible.

14. Under the Florida Rules of Professional Conduct:

(a) Rule 4-1.7 bars representation when personal interests, such as those identified with Kahn, Klein, and Vicari's entanglement (Exhibits A, B, F), materially limit advocacy. Even if unaware, their witness status (Exhibit B) and sealing effort (Exhibit E) demonstrate a personal stake, as *Young v. United States*, 481 U.S. 787, 803-04 (1987), warned that '*counsel's personal interest in the outcome*' impairs fairness, requiring disqualification.

(b) Rule 4-3.7 prohibits Kahn and Klein from serving as advocates, as their VBM records make them material witnesses (Exhibit B). *Anderson v. State*, 420 So. 2d 574, 576 (Fla. 1982), mandates disqualification when an attorney's testimony compromises judicial integrity, a principle applicable to their dual roles.

(c) Rule 4-1.10 imputes conflicts with all County Attorneys, as the pervasive fraud (Exhibits B, O) and sealing effort (Exhibit E) preclude impartial representation in this small office (21-50 attorneys, Exhibit F). *State v. Michaels*, 454 So. 2d 560, 562 (Fla. 1984), held that conflicts in small firms are imputed due to the close professional relationships.

(d) Rule 4-3.4(a) was breached by obstructing evidence through the sealing of exhibits (Exhibit E).

(e) Rule 4-8.4, which involves dishonesty and prejudice to justice, was also violated due to the sealing of exhibits (Exhibit E).

13. In *Moakley v. Smallwood*, 826 So. 2d 221 (Fla. 2002), the Florida Supreme Court upheld sanctions for litigation conduct which undermined judicial integrity, a close parallel applicable to the sealing of exhibits in this case (Exhibit E).

14. *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009) holds that the probability of bias by attorneys who are entangled as witnesses (Exhibits A, B, F), is constitutionally intolerable.

15. *Tumey v. Ohio*, 273 U.S. 510 (1927) establishes that a personal interest, such as Vicari's spousal conflict (Exhibit A), violates the Fourteenth Amendment.

16. *Rogers v. State*, 630 So. 2d 513 (Fla. 1993) confirms that cumulative bias, as evidenced by the attorneys' conflicts and sealing actions (Exhibits A, B, C, E, F), constitutes structural error, not subject to harmless-error review.

III. SYSTEMIC CASCADE CONFLICT AND STRUCTURAL ERROR BREAKDOWN

17. This case presents a cascade conflict, a systemic failure where County Attorneys (Exhibits A, B, F), election officials (Exhibit N), and judicial officers (Exhibit O) are entangled as victims of, witnesses to, and/or participants in, and/or beneficiaries of the same VBM fraud, as confirmed by the protected voter lock (Exhibit C, Exhibit G) and sealing effort (Exhibit E). Table 1 summarizes this entanglement. As *Williams v. Pennsylvania*, 579 U.S. 1, 8-9 (2016), articulated, '*an unconstitutional potential for bias exists when the same person serves as both accuser and adjudicator*,' necessitating disqualification.

18. Table 1: Cascade Conflict Entanglement:

Party	Role	Conflict Evidence	Exhibit	Legal Basis
Kelly Vicari	County Attorney	Spousal conflict via husband's VBM misuse	A, B, F	Rule 4-1.7, Caperton
Jared Kahn	County Attorney	Witness/victim via VBM misuse, sealing proponent	B, E, F	Rule 4-3.7, Young
Jeffrey Klein	County Attorney	Witness/victim via VBM misuse	B, F	Rule 4-3.7, Young
County Attorney's Office	Counsel	Imputed conflict in small office	F, O	Rule 4-1.10, Michaels
Election Officials	Defendants	Audit obstruction, fraud facilitation	N	F.S. § 104.0616
Judicial Officers	Tribunal	VBM status overrides	O	In re Murchison, Berger

19. The sealing of public records (Exhibit E, Pages 21-27) obstructs the tribunal's ability to evaluate systemic fraud, undermining judicial neutrality and reflecting an institutional collapse of ethical safeguards. The overbroad court orders (Exhibit E, Pages 23-27), influenced by conflicted attorneys (Exhibits B, F), exacerbate this cascading conflict, necessitating

vacatur; see *Times Publishing Co. v. Burke*, 375 So. 2d 297, 300 (Fla. 2d DCA 1979).

20. This entanglement violates the constitutional guarantee of due process under the Florida Constitution (Article I, § 9) and U.S. Constitution (Fourteenth Amendment), threatening the impartiality of the tribunal itself. *In re Murchison*, 349 U.S. 133, 136 (1955), mandated an '*absence of actual bias*' and prevention of '*the probability of unfairness*,' and *Berger v. United States*, 295 U.S. 78, 85 (1935), requires avoiding any '*appearance of bias*' to maintain public confidence, thus necessitating the disqualification of conflicted attorneys, and recusal of affected judicial officers (Exhibit O).

21. Judicial recusal and attorney disqualification are constitutionally mandated to preserve the integrity of these proceedings, as held in *Caperton* and *Tumey*.

22. The cascade conflict, exacerbated by the sealing efforts (Exhibit E), undermines public confidence and violates Appellant's right to a neutral tribunal. By compromising electoral integrity, this misconduct threatens the '*equal protection*' of voting rights, as *Bush v. Gore*, 531 U.S. 98, 104-05 (2000), warned against '*arbitrary and*

disparate treatment' in vote processing, dwarfing the trial-specific bias in *Rogers*.

IV. PRAYER FOR RELIEF

WHEREFORE, Appellant respectfully requests this Court:

1. Disqualify Kelly Vicari, Jared Kahn, Jeffrey Klein, and all attorneys affiliated with the Pinellas County Attorney's Office, from representing Appellees, due to their conflicts of interest (Exhibits A, B, C, E, F).

2. Bar the use of taxpayer funds for Appellees' defense, as their ultra vires, criminal, and bad-faith misconduct (Exhibits B, E) violates Fla. Stat. § 111.07.

3. Refer these matters to the Florida Bar for investigation and discipline of violations to Rules 4-1.7, 4-3.7, 4-1.10, 4-3.4, 4-8.4 (Exhibits A, B, E, F).

4. Direct the immediate production of the VR Systems Voter Focus audit logs, voter override logs, forensic election data, and full 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports from the Florida Division of Elections (Exhibit B, Exhibit N), to confirm the protected voter manipulation which occurred, and the unauthorized VBM requests for Branden M. Vicari,

Jared Kahn, and Jeffrey Klein, because the Supervisor of Elections' obstruction (19,000-hour estimate, Exhibit N), prevents access to critical evidence.

5. Deny or vacate any orders sealing exhibits, as such actions obstruct public access to evidence of fraud (Exhibits B, E) and violate Fla. Stat. § 119.07.

6. Grant such other relief as this Court deems just and proper.

V. CERTIFICATE OF GOOD FAITH

I HEREBY CERTIFY that this motion is filed in good faith, based on newly discovered evidence (Exhibits A, B, C, E, F, G) and prior filings (Exhibits A-Q, EXHIBITS A_Q.pdf), and is not for purposes of delay.

VI. LIST OF EXHIBITS

1. **Exhibit A**: Marriage Record for Kelly Vicari: A copy of the marriage record from the Pinellas County Clerk of Court website, dated November 8, 2014 (I#: 2014315203, BK: 18589 PG: 976, recorded 11/13/2014), confirming that Kelly Vicari (formerly Kelly Lynn Lewis) is married to Branden M. Vicari. This record establishes Vicari's spousal connection to a protected voter whose unauthorized

VBM requests on June 23, 2024, and September 9, 2024, create a disqualifying conflict under Rule 4-1.7 and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), as detailed in ¶¶ 5, 9 of the motion.

2. **Exhibit B**: VBM Election Reports Naming Vicari's Husband, Kahn, and Klein: Excerpts from the 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports, obtained from the Florida Department of State, Division of Elections at

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports, pursuant to Florida Rule 1S-2.043, Rule 1S-2.055, and Fla. Stat. § 101.62. The reports, partially included due to ongoing production delays by the Supervisor of Elections (Exhibit N), are intended to show the unauthorized VBM requests for Branden M. Vicari, Jared Kahn, and Jeffrey Klein, on June 23, 2024, and September 9, 2024, flagged as "N/N" (no identification provided), violating Fla. Stat. § 101.62(1)(b). These requests, part of the 219,673 and 196,055 illegal VBM ballot requests, confirm the attorneys' status as material witnesses and/or victims, necessitating their disqualification under Rule 4-3.7 and Rule 4-1.10, as alleged in ¶¶ 1-5, 9. Full reports are requested per ¶ D.

3. **Exhibit C:** Screenshot of the lock placed on Protected Voters on Pinellas County Supervisor of Elections Website: A screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov), captured on April 11, 2025, by John Siamas using Zight Screen Capture (Exhibit G), showing how a protected voter cannot request a VBM ballot online VBM requests for protected voters, as mandated by Fla. Stat. § 97.0585 and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf). The screenshot displays a "*Protected*" status or error message, confirming that requests for Branden M. Vicari and Jared Kahn were technically impossible without fraud or manual override, all which support the fraud allegations and attorneys' conflicts in ¶¶ 2-4, 9.

4. **Exhibit D:** Affidavit of Christopher Gleason: An affidavit by Appellant Christopher Gleason, dated April 28, 2025, attesting to the acquisition and authenticity of Exhibits A, B, C, E, F, G, and their relevance to the alleged VBM fraud involving voters whose information is protected, including Branden M. Vicari, Jared Kahn, and Jeffrey Klein. The affidavit confirms the marriage record's link to Vicari, the VBM reports' evidence of unauthorized requests, the screenshot's demonstration of the restriction placed on protected

voters, the sealing of exhibits/court records as attempted obstruction, and the attorneys' roles, all which support the motion's claims in ¶¶ 1-9.

5. **Exhibit E:** County Attorneys' Drafted Order and Court Orders to Seal Exhibits: A copy of the County Attorneys' draft sealing order, dated September 20, 2024, attached to Jared Kahn's email (Exhibit E, Pages 21-22), and court orders by Judge Patricia Muscarella (Exhibit E, Pages 23-27), requesting and granting the sealing of all exhibits in Case No. 522024CA003995XXCICI, including public election records (Exhibit B). These actions violate F.S. § 119.07 by obstructing access to non-exempt records and demonstrate bad faith under F.S. § 111.07, as alleged in ¶¶ 6, 9, reinforcing the need for disqualification and the prohibition of public funds for Defendant's legal fees.

6. **Exhibit F:** Florida Bar Member Profiles for Kelly Vicari, Jared Kahn, and Jeffrey Klein: Screenshots from the Florida Bar website (https://www.floridabar.org), captured April 24, 2025, confirming Kelly Vicari (Bar #88704), Jared Kahn (Bar #105276), and Jeffrey Klein (Bar #1025117) as government attorneys at the Pinellas County Attorney's Office (315 Court St, Clearwater, FL). These

profiles verify their roles, practice areas (City/County/Local Government Law), and office size (21-50 attorneys), supporting their disqualification under Rule 4-1.7, Rule 4-3.7, and imputed disqualification under Rule 4-1.10, as alleged in ¶¶ 4-5, 9, 14.a-c.

7. **Exhibit G:** Affidavit of John Siamas: Affidavit of John Siamas, dated April 28, 2025, attesting to the capture of a screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov) on April 11, 2025, using Zight Screen Capture. The affidavit confirms the screenshot's authenticity, showing a '*Protected*' status error message blocking online VBM requests for protected voters, as mandated by Fla. Stat. § 97.0585, supporting fraud allegations and attorney conflicts in ¶¶ 2-4, 9.

Dated: April 28, 2025

Respectfully submitted,

/s/ Christopher Gleason

Christopher Gleason, Pro Se
2098 Seminole Blvd #62122
Largo, FL 33778
Phone: 727-480-2059
Email: gleasonforpinellas@gmail.com

I HEREBY CERTIFY that a true and correct copy of the foregoing, along with Exhibits A, B, C, D, E, F, G, was furnished via email and the Florida Courts E-Filing Portal on April 24, 2025, to:

Clerk of the Second District Court of Appeal

Julie Marcus, Supervisor of Elections, Pinellas County

Dustin Chase, Deputy Supervisor of Elections

Matt Smith, General Counsel, Supervisor of Elections

Bruce Bartlett, Pinellas County State Attorney

Kelly L. Vicari, Esq., Jared Kahn, Esq., Jeffrey Klein, Esq., Attorneys for Appellees

/s/ Christopher Gleason

IV. NOTARY ACKNOWLEDGMENT

[AFFIANT SIGNATURE]

Sworn to and subscribed before me by means of ✓ physical presence or ____ online notarization, this 28th day of April 2025, by CHRISTOPHER GLEASON.

Notary Public – State of Florida

Scott Suprenant

[PRINT, TYPE, OR STAMP NAME OF NOTARY PUBLIC]

SCOTT SUPRENANT
Notary Public
State of Florida
Comm# HH506057
Expires 7/14/2028

Personally Known ____ OR Produced Identification ✓ [CHECK ONE]

Exhibit A

Marriage Record for Kelly Vicari

A copy of the marriage record obtained directly from the Pinellas County Clerk of Court website, dated November 8, 2014, confirming that Kelly Vicari is married to Branden M. Vicari. The record is authentic and unaltered and recorded as I#:2014315203 BK: 18589 PG:976, 11/13/2014 at 02:15 PM by KEN BURKE. This record establishes Vicari's spousal connection to a protected voter whose unauthorized VBM requests on June 23, 2024, and September 9, 2024, create a disqualifying conflict under Rule 4-1.7 and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), as detailed in ¶¶ 5, 8 of the motion.

I#: 2014315203 BK: 18589 PG: 976, 11/13/2014 at 02:15 PM, RECORDING 1 KEN BURKE, CLERK OF COURT AND COMPTROLLER PINELLAS COUNTY, FL BY DEPUTY CLERK: CLKPR03

Department of Health • Vital Statistics

STATE OF FLORIDA
MARRIAGE RECORD

TYPE IN UPPER CASE
USE BLACK INK

This license not valid unless seal of Clerk, Circuit or County Court, appears thereon.

(STATE FILE NUMBER)

2014 ML 2891182
(APPLICATION NUMBER)

APPLICATION TO MARRY

1. GROOM'S NAME (First, Middle, Last)			2. DATE OF BIRTH (Month, Day, Year)
BRANDEN MICHAEL VICARI			12/09/1984
3a. RESIDENCE - CITY, TOWN, OR LOCATION	3b. COUNTY	3c. STATE	4. BIRTHPLACE (State or Foreign Country)
PALM HARBOR	PINELLAS	FL	NY
5a. BRIDES NAME (First, Middle, Last)	5b. MAIDEN SURNAME (If different)		6. DATE OF BIRTH (Month, Day, Year)
KELLY LYNN LEWIS	LEWIS		08/23/1986
7a. RESIDENCE - CITY, TOWN, OR LOCATION	7b. COUNTY	7c. STATE	8. Birthplace (State or Foreign Country)
PALM HARBOR	PINELLAS	FL	MI

WE THE APPLICANTS NAMED IN THIS CERTIFICATE, EACH FOR HIMSELF OR HERSELF, STATE THAT THE INFORMATION PROVIDED ON THIS RECORD IS CORRECT TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THAT NO LEGAL OBJECTION TO THE MARRIAGE NOR THE ISSUANCE OF A LICENSE TO AUTHORIZE THE SAME IS KNOWN TO US AND HEREBY APPLY FOR LICENSE TO MARRY.

9. SIGNATURE OF GROOM (Sign full name using black ink)	10. SUBSCRIBED AND SWORN TO BEFORE ME ON (DATE)
> [signature]	10/13/2014
11. TITLE OF OFFICIAL	12. SIGNATURE OF OFFICIAL (Use black ink)
DEPUTY CLERK	> [signature]
13. SIGNATURE OF BRIDE (Sign full name using black ink)	14. SUBSCRIBED AND SWORN TO BEFORE ME ON (DATE)
> [signature]	10/13/2014
15. TITLE OF OFFICIAL	16. SIGNATURE OF OFFICIAL (Use black ink)
DEPUTY CLERK	> [signature]

LICENSE TO MARRY

AUTHORIZATION AND LICENSE IS HEREBY GIVEN TO ANY PERSON DULY AUTHORIZED BY THE LAWS OF THE STATE OF FLORIDA TO PERFORM A MARRIAGE CEREMONY WITHIN THE STATE OF FLORIDA AND TO SOLEMNIZE THE MARRIAGE OF THE ABOVE NAMED PERSONS. THIS LICENSE MUST BE USED ON OR AFTER THE EFFECTIVE DATE AND ON OR BEFORE THE EXPIRATION DATE IN THE STATE OF FLORIDA IN ORDER TO BE RECORDED AND VALID.

17. COUNTY ISSUING LICENSE	18. DATE LICENSE ISSUED	18a. DATE LICENSE EFFECTIVE	19. EXPIRATION DATE
PINELLAS	10/13/2014	10/16/2014	12/15/2014

20a. SIGNATURE OF COURT CLERK OR JUDGE	20b. TITLE	20c. BY D.C.
> [signature]	CLERK OF THE CIRCUIT COURT AND COMPTROLLER	DLF

CERTIFICATE OF MARRIAGE

I HEREBY CERTIFY THAT THE ABOVE NAMED GROOM AND BRIDE WERE JOINED BY ME IN MARRIAGE IN ACCORDANCE WITH THE LAWS OF THE STATE OF FLORIDA.

21. DATE OF MARRIAGE (Month, Day, Year)	22. CITY, TOWN, OR LOCATION OF MARRIAGE
Nov. 8, 2014	TAMPA, FLORIDA
23a. SIGNATURE OF PERSON PERFORMING CEREMONY (Use black ink)	23c. ADDRESS (Of person performing ceremony)
> [signature]	2686 BAYSHORE BLVD. DUNEDIN, FL
23b. NAME AND TITLE OF PERSON PERFORMING CEREMONY (Or notary stamp)	24. SIGNATURE OF WITNESS TO CEREMONY (Use black ink)
REV. FR. JERRY J. RITTENHOUSE	> [signature]
	25. SIGNATURE OF WITNESS TO CEREMONY (Use black ink)
	> [signature]

Exhibit B:

VBM Election Reports Naming Vicari's Husband, Kahn, and Klein
Excerpts from the 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports, obtained from the Florida Department of State, Division of Elections at https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports, pursuant to Florida Rule 1S-2.043, Rule 1S-2.055, and F.S. § 101.62. The reports show unauthorized VBM requests for Branden M. Vicari, Jared Kahn, and Jeffrey Klein on June 23, 2024, and September 9, 2024, flagged as "N/N" (no identification verification), violating F.S. § 101.62(1)(b). These requests, part of 219,673 and 196,055 illegal requests, confirm the attorneys' status as material witnesses or victims, necessitating disqualification under Rule 4-3.7 and Rule 4-1.10, as alleged in ¶¶ 1-5, 8.

AUGUST 20, 2024 PRIMARY ELECTION

VOTE BY MAIL EARLY VOTING REPORT EXTRACT

NOVEMBER 2024 GENERAL ELECTION

VOTE BY MAIL EARLY VOTING REPORT EXTRACT

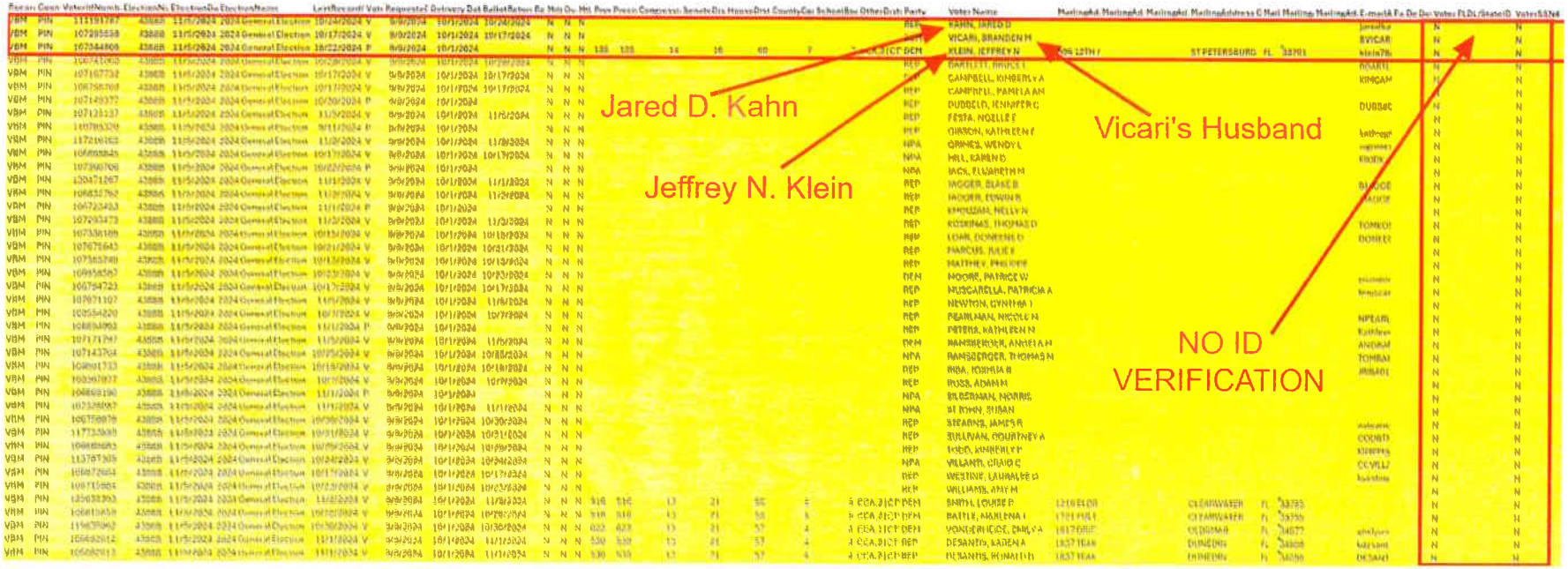


Exhibit C:

Screenshot of Protected Voter Lock on Pinellas County Supervisor of Elections Website
A screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov), captured on April 10, 2025, showing the protected voter lock mechanism that blocks online VBM requests for protected voters, as mandated by F.S. § 97.0585 and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf). The screenshot displays a "Protected" status or error message, confirming that requests for Branden M. Vicari, Kahn, and Klein were technically impossible without fraud or manual override, supporting the fraud allegations and attorneys' conflicts in ¶¶ 2-4, 8.

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Protected Voter Message

Select Language

Powered by Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Exhibit D:

Affidavit of Christopher Gleason
An affidavit by Appellant Christopher Gleason, dated April 24, 2025, attesting to the acquisition and authenticity of Exhibits A, B, C, and E, and their relevance to the alleged VBM fraud involving protected voters Branden M. Vicari, Jared Kahn, and Jeffrey Klein. The affidavit confirms the marriage record's link to Vicari, the VBM reports' evidence of unauthorized requests, the screenshot's demonstration of protected voter restrictions, and the sealing attempt's obstruction, supporting the motion's claims in ¶¶ 1-8.

STATE OF FLORIDA
COUNTY OF PINELLAS

AFFIDAVIT OF CHRISTOPHER GLEASON REGARDING AMENDED AND SUPPLEMENTED MOTION TO DISQUALIFY COUNTY ATTORNEYS AND BAR USE OF TAXPAYER FUNDS FOR DEFENSE

BEFORE ME, the undersigned authority, personally appeared Christopher Gleason, who, being duly sworn, deposes and says:

1. I am the Appellant/Petitioner in Case Nos. 2D2024-2687 and 2D2024-2688, pending in the Second District Court of Appeal of Florida, and the Plaintiff in the lower court proceedings, Case Nos. 522024CA003717XXCICI and 522024CA003995XXCICI, in the Circuit Court of the Sixth Judicial Circuit, Pinellas County, Florida. I am over 18 years of age, competent to testify, and have personal knowledge of the facts stated herein.

2. I submit this affidavit in support of my Amended and Supplemented Motion to Disqualify County Attorneys and Bar Use of Taxpayer Funds for Defense, filed in the above-captioned cases, to attest to the acquisition, authenticity, and

relevance of Exhibits A, B, C, and E, which demonstrate conflicts of interest, ethical violations, and systemic vote-by-mail (VBM) fraud involving protected voters Branden M. Vicari, Jared Kahn, and Jeffrey Klein, as alleged in paragraphs 1-8 of the motion.

3. **Exhibit A: Marriage Record for Kelly Vicari**

On 04/24/2025, I obtained a copy of the marriage record for Kelly Vicari formerly Kelly Lynn Lewis, from the Pinellas County Clerk of Court website, confirming that she is married to Branden Michael Vicari. The record is authentic and unaltered and recorded as I#:2014315203 BK: 18589 PG:976, 11/13/2014 at 02:15 PM by KEN BURKE. This exhibit establishes Vicari's spousal connection to a protected voter whose unauthorized VBM requests on June 23, 2024, and September 9, 2024, create a disqualifying conflict of interest under Rule 4-1.7, Florida Rules of Professional Conduct, and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), as detailed in paragraphs 5 and 8 of the motion.

4. **Exhibit B: VBM Election Reports Naming Vicari's Husband, Branden M. Vicari, Kahn, and Klein**

I personally accessed and downloaded excerpts from the 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports from the Florida Department of State, Division of Elections, at https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports, pursuant to Florida Rule 1S-2.043, Rule 1S-2.055, and F.S. § 101.62. These reports are authentic official election records and public records showing unauthorized VBM requests for Branden M. Vicari, Jared Kahn, and Jeffrey Klein on June 23, 2024, and September 9, 2024, flagged as "N/N" (no identification verification), in violation of F.S. § 101.62(1)(b). The requests, part of 219,673 and 196,055 illegal requests, confirm the attorneys' status as material witnesses or victims, necessitating disqualification under Rule 4-3.7 and Rule 4-1.10, as alleged in paragraphs 1-5 and 8 of the motion.

5. **Exhibit C: Screenshot of Protected Voter Lock on Pinellas County Supervisor of Elections Website**

On or about April 10, 2025 I was with John Siamus who captured a screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov) using Zight Screen Capture. The screenshot is authentic, unaltered. It displays the protected voter lock mechanism, showing a "Protected" status or error message that blocks online VBM requests for protected voters, as mandated by F.S. § 97.0585 and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf). This exhibit confirms that VBM requests for Branden M. Vicari, and Jared D. Kahn, and Klein were technically impossible without fraud or manual override, supporting the fraud allegations and attorneys' conflicts in paragraphs 2-4 and 8 of the motion.

6. **Exhibit E: County Attorneys' Motion to Seal Exhibits**

On 04/24/2025, I obtained a copy of the court order drafted by County Attorneys, dated [Insert Date of Motion], requesting to seal all exhibits in Case Nos. 522024CA003995XXCICI,

including public VBM reports (Exhibit B). The document is authentic, as obtained from [Specify Source, e.g., court docket, opposing counsel]. The sealing attempt violates F.S. § 119.07 by obstructing access to non-exempt records and demonstrates bad faith under F.S. § 111.07, as it seeks to conceal evidence of fraud implicating the attorneys, Branden M. Vicari, and judicial officers (Exhibit O, EXHIBITS A_Q.pdf), as alleged in paragraphs 6 and 8 of the motion.

7. The above exhibits are directly relevant to the motion's claims:

   a. Exhibit A confirms Vicari's personal conflict via her husband's involvement, supporting disqualification (¶ 5).

   b. Exhibit B establishes Jared D. Kahn, Jeffrey N. Klein, and Branden M. Vicari as witnesses or victims of VBM fraud, triggering Rule 4-3.7 and Rule 4-1.10 (¶¶ 1-5).

   c. Exhibit C proves the technical impossibility of the VBM requests, evidencing fraud and systemic misconduct (¶¶ 2-4, 8).

d. Exhibit E demonstrates the County Attorneys' bad faith and obstruction, justifying the bar on public funding and referral to the Florida Bar (¶¶ 6, 8).

8. The facts stated herein are true to the best of my knowledge and belief. I have not altered or misrepresented any exhibit, and I obtained them through lawful means as described. The exhibits support the motion's allegations of conflicts of interest, ethical violations, unlawful public expenditures, and a systemic cascade conflict violating due process, as detailed in paragraphs 1-8.

FURTHER AFFIANT SAYETH NAUGHT.

Dated: April 28, 2025

/s/ Christopher Gleason

Christopher Gleason
2098 Seminole Blvd #6212
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com, gleasonforpinellas@gmail.com

STATE OF FLORIDA
COUNTY OF PINELLAS

Sworn to and subscribed before me this 28th day of April, 2025, by Christopher Gleason, who is personally known to me (or who produced identification:

Notary Public, State of Florida
Name: Scott Suprenant
Commission No.: HH506057
My Commission Expires: July 14, 2028
[Notary Seal]

SCOTT SUPRENANT
Notary Public
State of Florida
Comm# HH506057
Expires 7/14/2028

Exhibit E:

County Attorneys' Drafted Order to Seal Exhibits

A copy of the County Attorneys' draft of the sealing order, dated September 20, 2024, requesting to seal all exhibits in Case Nos. 522024CA003995XXCICI, including public election records (Exhibit B). This action violates F.S. § 119.07 by obstructing access to non-exempt records and demonstrates bad faith under F.S. § 111.07, as alleged in ¶¶ 6, 8, reinforcing the need for disqualification and barring public funding.

Gmail Christopher Gleason <gleasonforpinellas@gmail.com>

Proposed Order - Christopher Gleason v. Julie Marcus, et al. 24-003995-C

Kahn, Jared D <jkahn@pinellas.gov> Fri, Sep 20, 2024 at 8:28 AM
To: Christopher Gleason <gleasonforpinellas@gmail.com>
Cc: "immutabletruth@protonmail.com" <immutabletruth@protonmail.com>, Christopher Gleason <cpgleason72@gmail.com>, "Klein, Jeffrey" <jklein@pinellas.gov>, "Vicari, Kelly L" <kvicari@pinellas.gov>, "Curtis, Michelle M" <mmcurtis@pinellas.gov>, "Noe, Barbara" <banoe@pinellas.gov>

Mr Gleason,

I will submit the proposed order this morning noting your objection.

Have a blessed day,

Jared Kahn

On Sep 20, 2024, at 7:58 AM, Christopher Gleason <gleasonforpinellas@gmail.com> wrote:

I definitely object, you are asking to seal all exhibits. That was not even discussed or brought before the court. Your motion was to seal Exhibit G.

On Thu, Sep 19, 2024 at 5:19 PM Kahn, Jared D <jkahn@pinellas.gov> wrote:

Mr. Gleason,

Please see proposed order in Christopher Gleason v. Julie Marcus, et al. 24-003995-CI; GRANTING without prejudice DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS and GRANTING without prejudice DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION.

Please let me know if you have any objections or suggested edits. I will plan to upload this order tomorrow 9/20/24 morning around 11AM if I do not hear from you first.

Have a nice evening,

Jared D. Kahn

Senior Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, 6th Floor

Clearwater, FL 33756

Phone: (727) 464-3354

Fax: (727) 464-4147

jkahn@pinellas.gov

All government correspondence is subject to the public records law.

image001.png
35K

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON, Candidate for Supervisor of Elections, Pinellas County, Elector, Citizen, and Taxpayer,

Plaintiff,

v.

Case No.: 24-003995-CI
UCN: 522024CA003995XXCICI

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et al.,

Defendants.

_____/

ORDER GRANTING DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND GRANTING DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION

THIS MATTER came before this Court on September 19, 2024, on DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION, having considered the Motions, the case file, the applicable law, and otherwise fully advised in the premises, the Court hereby **ORDERS and ADJUDGES** that DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS is hereby **GRANTED without prejudice** and DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF

RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION is hereby **GRANTED without prejudice.**

The Pinellas County Clerk of the Circuit Court is directed to maintain all exhibits filed by Plaintiff as Protected/Confidential/Sensitive until further order of the court.

Plaintiff has until **September 19th, 2024,** to respond to DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS.

Plaintiff has until **September 23rd, 2024,** to re-file exhibits with Protected/Confidential/Sensitive data redacted or, in the alternative, file a response in opposition to DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTIVE AND JUDICIAL ADMINISTRATION stating the reason Protected/Confidential/Sensitive should not be protected.

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida this ____ day of September 2024. A true and correct copy of the forgoing has been furnished to all parties listed below.

Judge Patricia Muscarella

cc: all parties

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON, Candidate for Supervisor of Elections, Pinellas County, Elector, Citizen, and Taxpayer,

Plaintiff,

v.

Case No.: 24-003995-CI
UCN: 522024CA003995XXCICI

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et al.,

Defendants.

_____/

ORDER GRANTING DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND GRANTING DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION

THIS MATTER came before this Court on September 19, 2024, on DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION, having considered the Motions, the case file, the applicable law, and otherwise fully advised in the premises, the Court hereby **ORDERS and ADJUDGES** that DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS is hereby **GRANTED without prejudice** and DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425,

FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION is hereby **GRANTED without prejudice.**

The Pinellas County Clerk of the Circuit Court is directed to maintain all exhibits filed by Plaintiff as Protected/Confidential/Sensitive until further order of the court.

Plaintiff represented to the Court that he would respond in writing with his opposition to Defendant's motions as to Exhibit G by close of business on September 19th, 2024. Although not received until the morning of September 20th, 2024, the Court nonetheless deems Plaintiff's opposition timely. Defendant shall have until **September 27th, 2024** to serve a reply, if any, to Plaintiff's opposition.

Plaintiff has until **September 23rd, 2024,** to re-file the additional exhibits with Protected/Confidential/Sensitive data redacted or, in the alternative, file a response in opposition to DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION stating his basis or claim of exemption for the inapplicability of Protected/Confidential/Sensitive status as to the exhibits in question.

The parties may renew argument on Defendant's Motions and any related filings at the Case Management Conference scheduled in this matter on **October 1, 2024 at 12:00 P.M.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida this ____ day of September 2024. A true and correct copy of the forgoing has been furnished to all parties listed below.

Patricia Muscarella
24-003995-CI 9/20/2024 3:52:08 PM
Circuit Judge Patricia A. Muscarella
24-003995-CI 9/20/2024 3:52:08 PM

Judge Patricia Muscarella

Exhibit F:

Florida Bar Member Profiles for Kelly Vicari, Jared Kahn, and Jeffrey Klein

Screenshots from the Florida Bar website (https://www.floridabar.org), captured April 24, 2025, confirming Kelly Vicari (Bar #88704), Jared Kahn (Bar #105276), and Jeffrey Klein (Bar #1025117) as government attorneys at the Pinellas County Attorney's Office (315 Court St, Clearwater, FL). These profiles verify their roles, practice areas (City/County/Local Government Law), and office size (21-50 attorneys), supporting disqualification under Rule 4-1.7, Rule 4-3.7, and imputed disqualification under Rule 4-1.10, as alleged in ¶¶ 4-5, 9, 14.a-c.

MEMBER PROFILE

Kelly Lynn Vicari

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:

88704

Mail Address:

Pinellas County Attorney's Office
315 Court St
Clearwater, FL 33756-5165

Office: **727-464-3354**

Cell: **727-464-3354** - No Text Messages

Email:

kvicari@pinellascounty.org

Personal Bar URL:

https://www.floridabar.org/mybarprofile/88704

vCard:

County:

Pinellas

Circuit:

06

Admitted:

04/14/2011

10-Year Discipline History:

None

Law School:

Florida Coastal School of Law, 2010

Board Certifications:

Area	Year
City, County and Local Government Law	2019

Sections:

City, County & Local Govt Law

Practice Areas:

City/County/Local Government

Civil Litigation

Workers' Compensation/Defense

Federal Courts:

Florida Middle District Bankruptcy Court

U.S. District Court, Middle District of Florida

U.S. District Court, Northern District of Florida

Firm Position:

Government attorney

The Find a Lawyer directory is provided as a public service. The Florida Bar maintains limited basic information about lawyers licensed to practice in the state (e.g., name, address, year of birth, gender, law schools attended, admission year). However, The Florida Bar allows individual attorneys the opportunity to add personal and professional information to the directory. The lawyer is solely responsible for reviewing and updating any additional information in the directory. The lawyer's added information is not reviewed by The Bar for accuracy and The Bar makes no warranty of any kind, express or implied. The Florida Bar, its Board of Governors, employees, and agents are not responsible for the accuracy of that additional information. Publication of lawyers' contact information in this listing does not mean the lawyers have agreed to receive unsolicited communications in any form. Unauthorized use of this data may result in civil or criminal penalties. The Find a Lawyer directory is not a lawyer referral service.

MEMBER PROFILE

Jared Douglas Kahn

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:

105276

Mail Address:

Pinellas County Attorney's Office
315 Court St
Clearwater, FL 33756-5165

Office: **727-464-3354**

Email:

jkahn@pinellas.gov

Personal Bar URL:

https://www.floridabar.org/mybarprofile/105276

vCard:

County:

Pinellas

Circuit:

06

Admitted:

09/27/2013

10-Year Discipline History:

None

Law School:

John Marshall Law School

Sections:

City, County & Local Govt Law

Trial Lawyers

Practice Areas:

City/County/Local Government

Civil Trial

Criminal

Trial

Federal Courts:

U.S. Court of Appeals for the Eleventh Circuit

U.S. District Court, Middle District of Florida

U.S. District Court, Northern District of Florida

U.S. District Court, Southern District of Florida

State Courts:

District Of Columbia

Firm:

Pinellas County Attorney's Office

Firm Size:

21-50

Firm Position:

Government attorney

The Find a Lawyer directory is provided as a public service. The Florida Bar maintains limited basic information about lawyers licensed to practice in the state (e.g., name, address, year of birth, gender, law schools attended, admission year). However, The Florida Bar allows individual attorneys the opportunity to add personal and professional information to the directory. The lawyer is solely responsible for reviewing and updating any additional information in the directory. The lawyer's added information is not reviewed by The Bar for accuracy and The Bar makes no warranty of any kind, express or implied. The Florida Bar, its Board of Governors, employees, and agents are not responsible for the accuracy of that additional information. Publication of lawyers' contact information in this listing does not mean the lawyers have agreed to receive unsolicited communications in any form. Unauthorized use of this data may result in civil or criminal penalties. The Find a Lawyer directory is not a lawyer referral service.

MEMBER PROFILE

Jeffrey Nathaniel Klein

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:

1025117

Mail Address:

Pinellas County Attorney's Office
315 Court St Fl 6
Clearwater, FL 33756-5165

Office: **727-464-3354**

Email:

jklein@pinellascounty.org

Personal Bar URL:

https://www.floridabar.org/mybarprofile/1025117

vCard:

County:

Pinellas

Circuit:

06

Admitted:

11/23/2020

10-Year Discipline History:

None

Sections:

City, County & Local Govt Law

Young Lawyers

Firm:

Pinellas County Attorney's Office

Firm Position:

Government attorney

The Find a Lawyer directory is provided as a public service. The Florida Bar maintains limited basic information about lawyers licensed to practice in the state (e.g., name, address, year of birth, gender, law schools attended, admission year). However, The Florida Bar allows individual attorneys the opportunity to add personal and professional information to the directory. The lawyer is solely responsible for reviewing and updating any additional information in the directory. The lawyer's added information is not reviewed by The Bar for accuracy and The Bar makes no warranty

Exhibit G:

Affidavit of John Siamus

Affidavit of John Siamus, dated April 24, 2025, attesting to the capture of a screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov) on April 10, 2025, using Zight Screen Capture. The affidavit confirms the screenshot's authenticity, showing a 'Protected' status or error message blocking online VBM requests for protected voters, as mandated by F.S. § 97.0585, supporting fraud allegations and attorney conflicts in ¶¶ 2-4, 9.

AFFIDAVIT OF JOHN SIAMASDETAILING THE EVENTS OF REQUESTING A VOTE-BY-MAIL-BALLOT AS A PROTECTED VOTER

STATE OF FLORIDA)

) ss:

COUNTY OF PINELLAS)

Before me, the undersigned authority, personally appeared JOHN SIAMAS, who, being duly sworn, states as follows:

AFFIANT IDENTITY

1. I, John Siamas, was a Republican candidate for the Florida State Sente District 21 Primary Election held on August 20th, 2024. I am over 18 and competent to make this affidavit and have personal knowledge of the facts stated herein.

PURPOSE OF AFFIDAVIT

2. This affidavit is made to establish the process I underwent requesting a Mail Ballot from the Pinellas County Supervisor of Elections as a "Protected Voter" on April 11, 2025 at 12:17 p.m.

MAIL BALLOT REQUEST FROM THE PINELLAS COUNTY SUPERVISOR OF ELECTIONS OFFICE

3. On April 11, 2025, at 12:17 p.m., I accessed the Pinellas County Supervisor of Elections website (*votepinellas.gov*) to request a mail ballot. I took screenshots of the entire process and have included them as **Exhibit 1**.

4. After entering all the requested information, I received a message which stated "The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

5. I then proceeded to call the Supervisor of Elections in Pinellas County as instructed in the message I received, at 12:20 p.m.

6. I spoke with a Supervisor of Elections Representative who stated that protected voters cannot request their Mail Ballot online. He then stated he could process my Mail Ballor request over the phone and proceeded to request some information in order to process the Mail Ballot request.

7. The information requested included my name, address, date of birth, and the last 4 of my SSN. I was not instructed to fill out any forms or provide any additional details to process the Mail Ballot request. I transcribed the full conversation with the Supervisor of Election Representative I had on April 11, 2025 (see **Exhibit 2**).

4. All of the records attached to this affidavit are true and correct copies of documents created at or near the time of the described events.

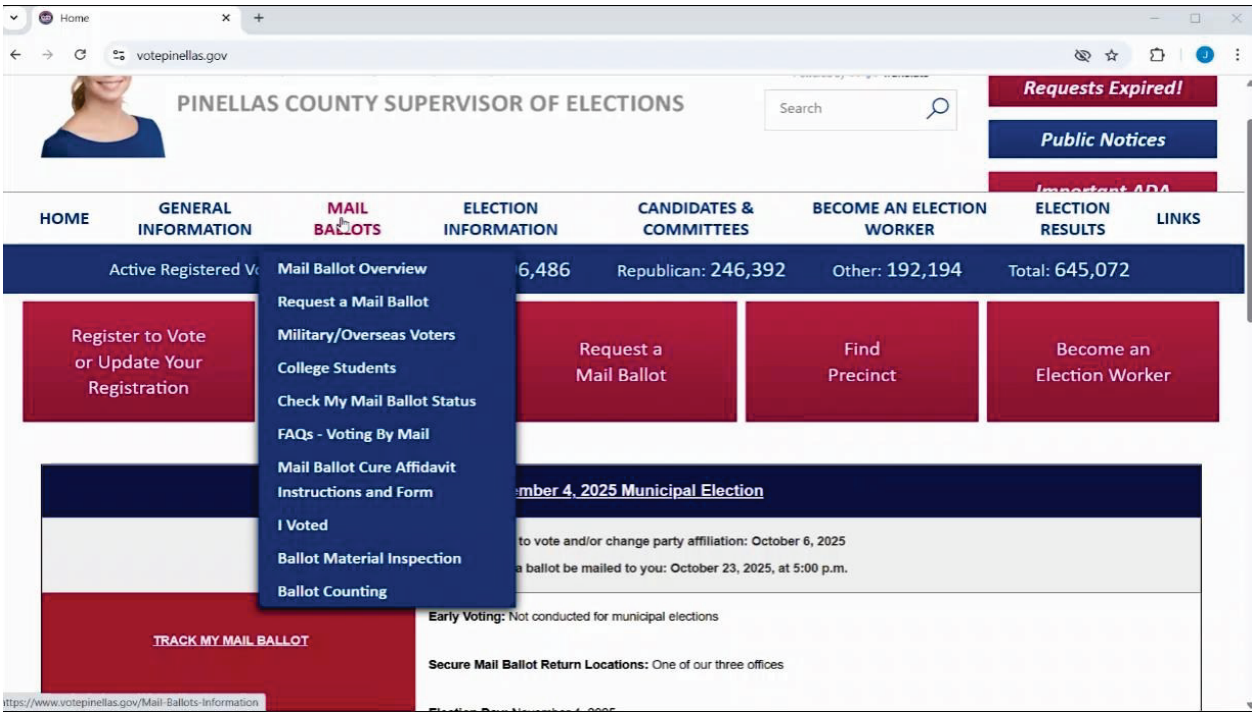
LIST OF EXHIBITS

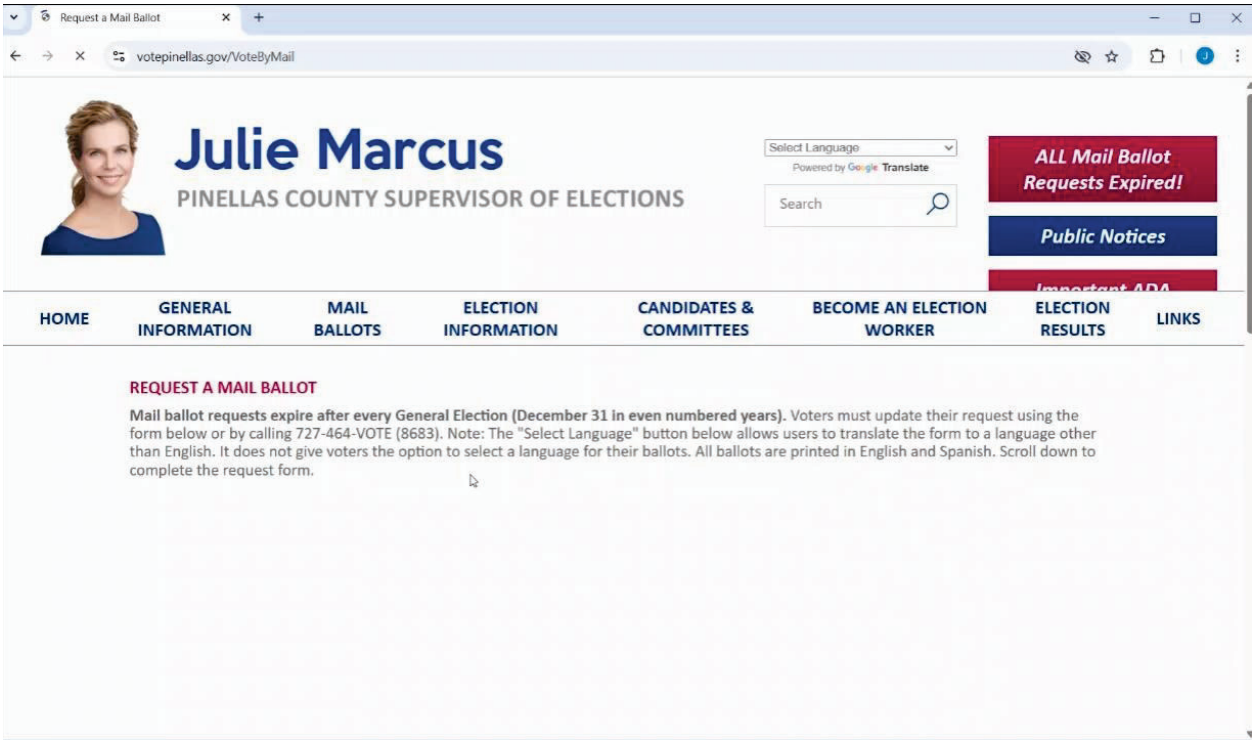
1. **Exhibit 1**: Screenshots of online Mail Ballot Request from the website of the Pinellas County Supervisor of Election website, *votepinellas.gov.*

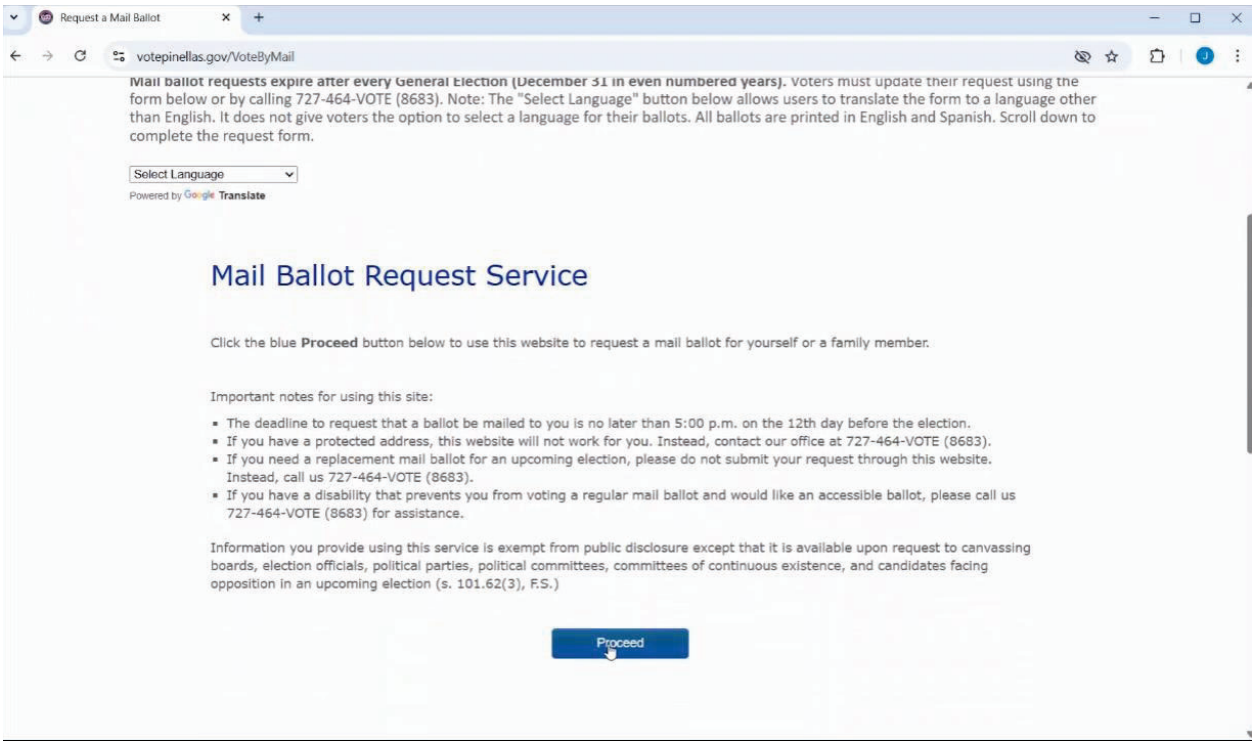
2. **Exhibit 2**: Transcription of Conversation with the Pinellas County Supervisor of Election Representative requesting a Mail Ballot on April 11, 2025, 12:20 p.m.

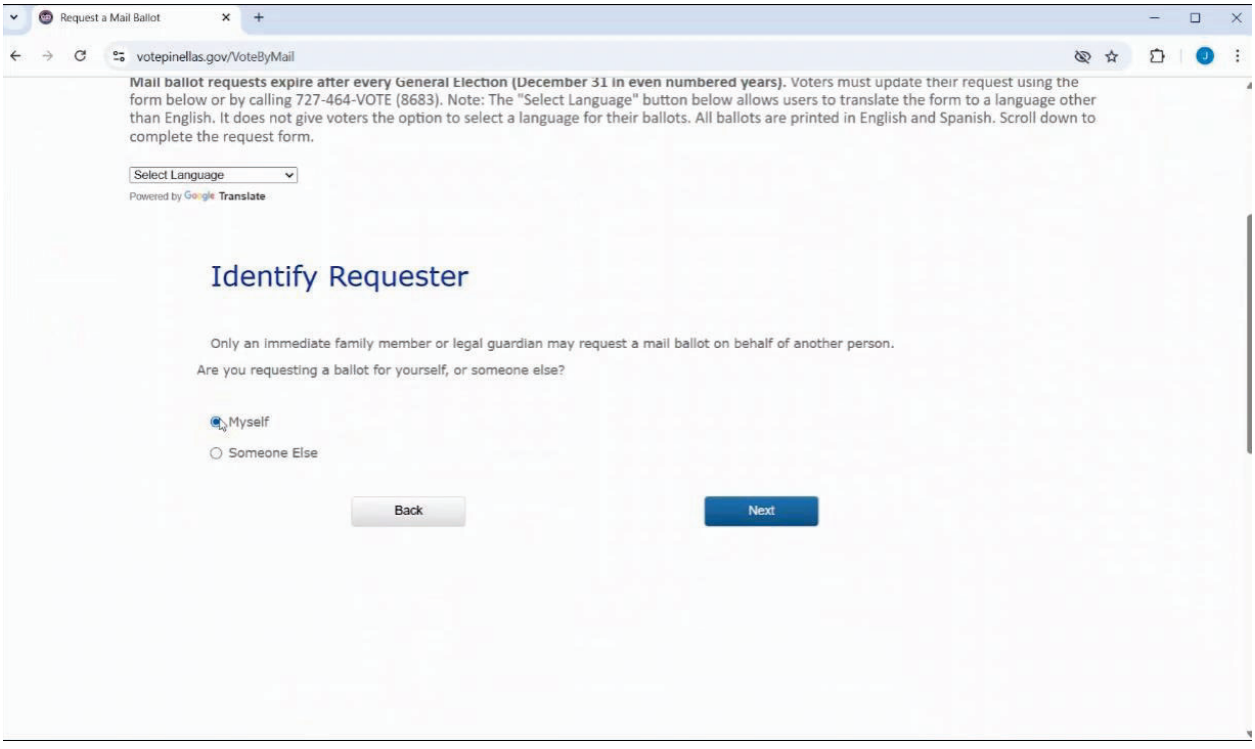
Exhibit 1

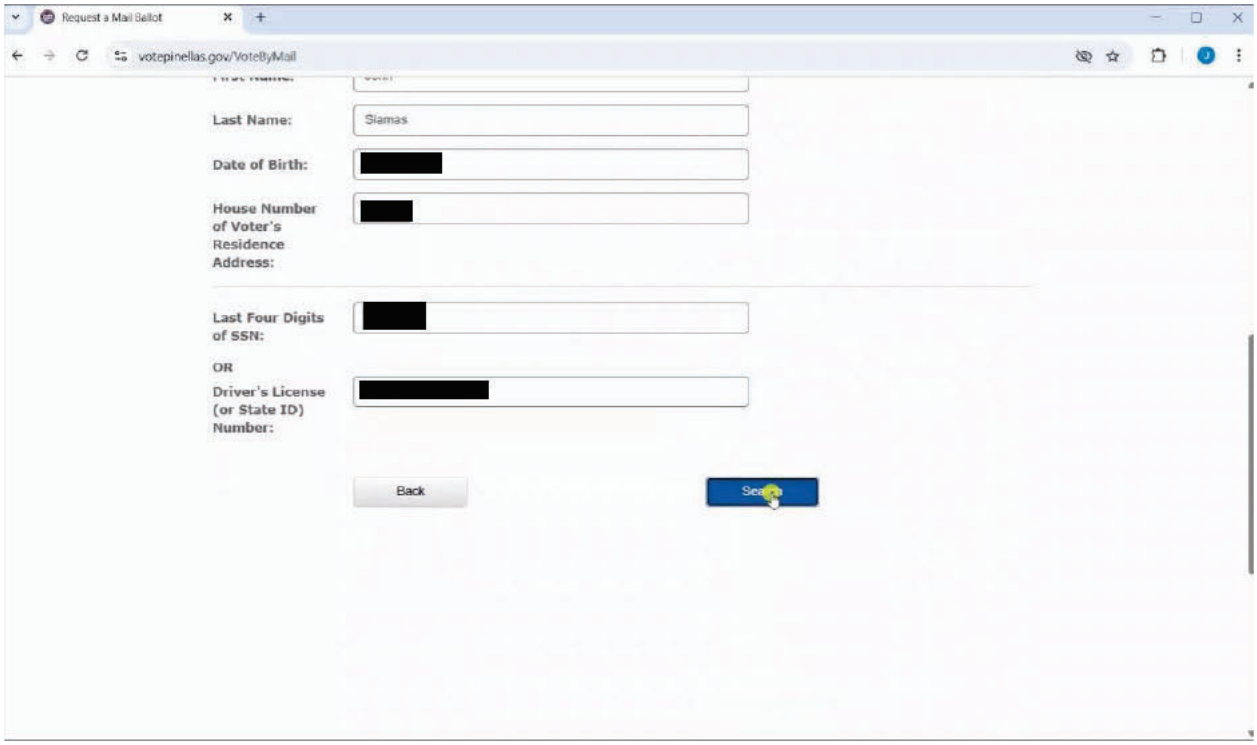
Screenshots of online Mail Ballot Request from the website of the Pinellas County Supervisor of Election website, *votepinellas.gov.*




votepinellas.gov/VoteByMail
Julie Marcus
PINELLAS COUNTY SUPERVISOR OF ELECTIONS
Select Language
Powered by Google Translate
Search
ALL Mail Ballot Requests Expired!
Public Notices
HOME
GENERAL INFORMATION
MAIL BALLOTS
ELECTION INFORMATION
CANDIDATES & COMMITTEES
BECOME AN ELECTION WORKER
ELECTION RESULTS
LINKS
REQUEST A MAIL BALLOT
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.


Request a Mail Ballot
votepinellas.gov/VoteByMail
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Mail Ballot Request Service
Click the blue Proceed button below to use this website to request a mail ballot for yourself or a family member.
Important notes for using this site:
The deadline to request that a ballot be mailed to you is no later than 5:00 p.m. on the 12th day before the election.
If you have a protected address, this website will not work for you. Instead, contact our office at 727-464-VOTE (8683).
If you need a replacement mail ballot for an upcoming election, please do not submit your request through this website. Instead, call us 727-464-VOTE (8683).
If you have a disability that prevents you from voting a regular mail ballot and would like an accessible ballot, please call us 727-464-VOTE (8683) for assistance.
Information you provide using this service is exempt from public disclosure except that it is available upon request to canvassing boards, election officials, political parties, political committees, committees of continuous existence, and candidates facing opposition in an upcoming election (s. 101.62(3), F.S.)
Proceed


Request a Mail Ballot
votepinellas.gov/VoteByMail
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Identify Requester
Only an immediate family member or legal guardian may request a mail ballot on behalf of another person.
Are you requesting a ballot for yourself, or someone else?
Myself
Someone Else
Back
Next


Request a Mail Ballot
votepinellas.gov/VoteByMail
Last Name:
Siamas
Date of Birth:
House Number of Voter's Residence Address:
Last Four Digits of SSN:
OR
Driver's License (or State ID) Number:
Back

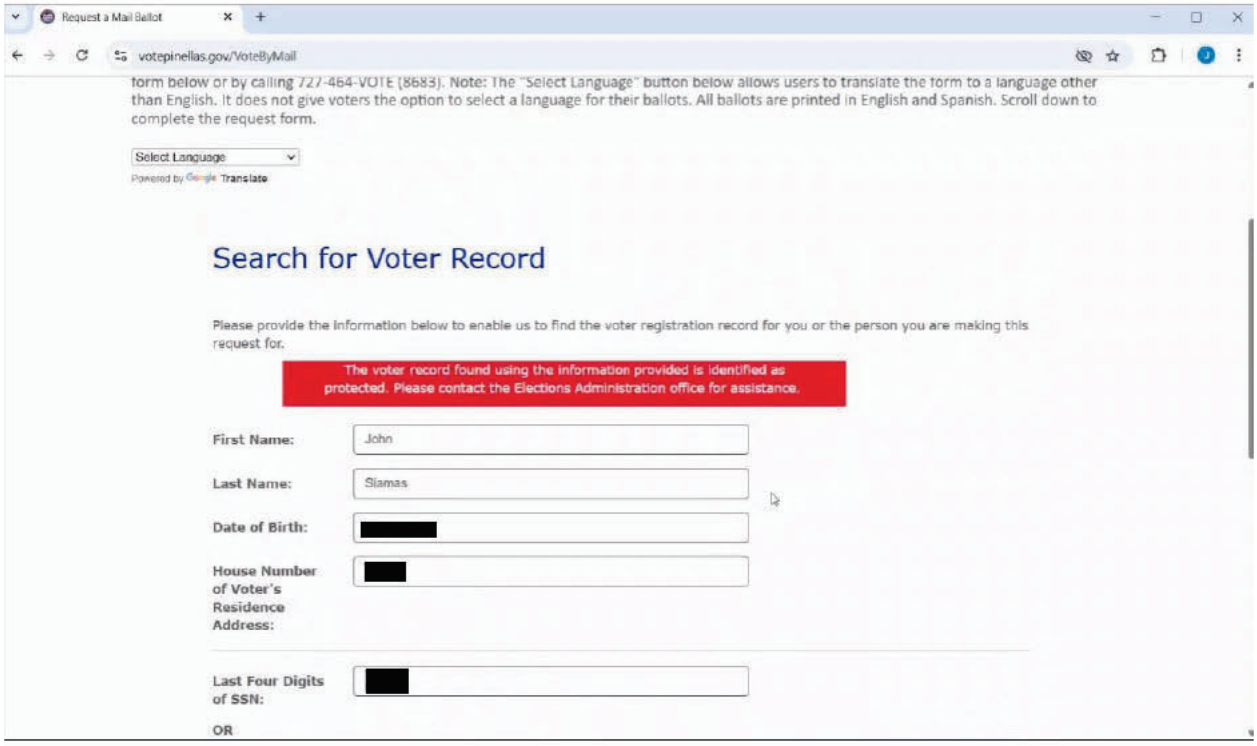

Request a Mail Ballot
votepinellas.gov/VoteByMail
form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Search for Voter Record
Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.
The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.
First Name:
John
Last Name:
Siamas
Date of Birth:
House Number of Voter's Residence Address:
Last Four Digits of SSN:
OR

Exhibit 2

Transcription of Conversation with the Pinellas County Supervisor of Election Representative requesting a Mail Ballot on April 11, 2025, 12:20 p.m.

Siamas: Hi good morning, I just tried to apply for my mail ballot, and I guess, not I guess I'm protected so there was a message that said I need to contact the elections administration office for assistance.

Supervisor of Elections Representative: Yea so if it's protected it's not going to allow, I'll do it over the phone.

Siamas: Oh ok so is that what happens, I can't do it online anymore because it's protected?

Supervisor of Elections Representative: Um yea I mean I've found that, I don't know how long it's been like that but yea you call in cause it's a protected address.

Siamas: Ok I'm just curious because I just recently became, You know I just recently submitted my paperwork to.

Supervisor of Elections Representative: Yea so we can do it over the phone.

Siamas: Ok is that cause it said elections administration office, I got a little confused I didn't know whether that is your office or another office.

Supervisor of Elections Representative: Yea it's the Supervisor of Elections Office.

Siamas: Ok, ok fantastic, yea just let me know what's next, I'm sorry.

Supervisor of Elections Representative: I just need your, just need your last name and your date of birth to get started.

Siamas: Ok so it's S-I-A-M-A-S.

Supervisor of Elections Representative: What's your date of birth?

Siamas: [redacted]

Supervisor of Elections Representative: Ok just give me a second.

Siamas: Actually this might apply to my spouse as well I'm assuming right? Because she, they would be included so, she hasn't tried yet but um, but I guess it would be the same process right?

Supervisor of Elections Representative: Um yes it's protected. Last four of

your social to verify the record please.

Siamas: Sure [redacted]

Supervisor of Elections Representative: Ok, and verify your address please.

Siamas: Yea its [redacted]

[redacted] Let me get my, do you need my driver's license?

Supervisor of Elections Representative: Uh, no Sir.

Siamas: Ok

Supervisor of Elections Representative: Give me a second here while I verify your record.

Siamas: Do you know why that is when you are protected, uh you gotta go through this process?

Supervisor of Elections Representative: I don't know why, I do know if somebody didn't have, you have one or the other you have your DL or the last four of your Social and you enter one or the other.

Siamas: Oh, I entered both is that why its coming up.

Supervisor of Elections Representative: No

Siamas: Oh ok ok, I thought I maybe screwed up when I was entering the data.

Supervisor of Elections Representative: Alright so, so your record is updated and it's good until December 31, 2026, so it's all this year and next year, um you are in a county not in a municipality so.

Siamas: Correct.

Supervisor of Elections Representative: So you have nothing scheduled for this year unless we have a special election then you will receive a mail ballot, other than that next year.

Siamas: Ok so I'm good to go when, um.

Supervisor of Elections Representative: You are good to go all the way to next year.

Siamas: So I'll get it in the mail right, I don't have to worry about that or

anything?

Supervisor of Elections Representative: Right, right you'll get it, if for some reason you don't, you can always call or go online to see the status of it.

Siamas: Oh, can I check the status?

Supervisor of Elections Representative: I don't know if you are protected, I don't have that answer.

Siamas: Ok got it, well I'll give it a shot after a couple days, after it gets into the system I guess, I didn't even know you can do that.

Supervisor of Elections Representative: Yea you can check your status, and if you pull that up during an election you can pull that up and it will tell you where your ballot is, when its been mailed, if its been counted, you know that whole process.

Siamas: Gotcha, ok yea I haven't even been in this ballot status thing, I didn't even know it exists to be honest with you, yea I don't expect it to be updated right away so um, I'll um, I'll take a look in.. This is interesting, not that I'm questioning it, I'm just, its interesting how it um, and it's good, I'm very happy that the protected has to go through a um different process.

Supervisor of Elections Representative: My guess is you can't pull up your information since it is protected, also if there is a record request it is protected so a third party could not get that information cause it is protected so that's the whole thing.

Siamas: ok, um fantastic, well thank you so much for your help I um really appreciate it

Supervisor of Elections Representative: Alright have a good

Siamas: Thank you bye bye.

[AFFIANT SIGNATURE]

Sworn to and subscribed before me by means of ✓ physical presence or _____ online notarization, this 28th day of April 2025, by JOHN SIAMAS.

Notary Public – State of Florida

Eliana Pimentel

ELIANA PIMENTEL
Notary Public - State of Florida
Commission # HH 496125
My Comm. Expires May 9, 2028

Personally Known _____ OR Produced Identification ✓

Type of Identification Produced: Drivers License

Filing # 218776942 E-Filed 03/13/2025 10:30:04 PM

DISTRICT COURT OF APPEAL OF FLORIDA
SECOND DISTRICT

CASE NO.: 2D2024-2687
(Lower Tribunal Case No.: 24-003717-CI)

CHRISTOPHER GLEASON,

Appellant,

v.

JULIE MARCUS, et al.,

Appellees.

APPELLANT'S MOTION TO DISQUALIFY DEFENSE COUNSEL FOR UNLAWFUL USE OF PUBLIC FUNDS

COMES NOW, Appellant Christopher Gleason, pro se, pursuant to Florida Rule of Appellate Procedure 9.040(c) and Florida Statutes, and moves this Court to disqualify defense counsel—Jared N. Kahn and Kelly L. Vicari of the Pinellas County Attorney's Office—representing Appellees Julie Marcus and others, for unlawful use of taxpayer funds. Florida law prohibits public officials from using county-funded counsel when accused of fraud, felonies, and official misconduct, as here. This motion is supported by the Petition for Writ of Mandamus ((pending)) and Motion for Judicial Notice ((pending)).

I. INTRODUCTION AND FACTUAL BASIS

1. Appellant, a candidate and taxpayer, alleges Appellees committed election fraud involving 415,728 illegal vote-by-mail ballots (Petition, ¶¶ 4-6; Exhibit O), official misconduct (§ 838.022, Fla. Stat.), and felonies (e.g., 18 U.S.C. §§ 1341, 1343), prompting 220 grand jury requests (Petition, ¶¶ 7-8; Exhibits E, F).

2. County attorneys Kahn and Vicari, employed by the Pinellas County Attorney's Office (Exhibit G, Employment Record), defend Appellees using public funds, despite these acts falling outside lawful duties (§ 111.07, Fla. Stat.).

3. Florida law bars such representation, necessitating disqualification to protect public resources and ensure ethical proceedings.

II. LEGAL BASIS FOR DISQUALIFICATION

A. Florida Law Prohibits Taxpayer-Funded Defense

4. **§ 111.07, Fla. Stat.**: Limits public-funded defense to officials sued "in their official capacity" for "act[s] or omission[s] aris[ing] out of and in the scope of ... employment" in good faith. Fraud (415,728 ballots), felonies, and misconduct exceed this scope (*Nuzum v. Walldes*, 455 So. 2d 915, 917 (Fla. 1st DCA 1984)).

5. **AGO 77-98**: "Public funds may not be used to defend officials charged with misconduct or crimes" (AGO 77-98, Sept. 13, 1977).

6. **AGO 91-85**: "Legal representation at public expense is improper where fraud or abuse of power is alleged" (AGO 91-85, Nov. 19, 1991).

7. **Caselaw**:

   - *Nuzum v. Valdes*, 455 So. 2d at 917: Ultra vires acts (beyond authority) bar public defense.
   - *State ex rel. Brautigam v. White*, 138 So. 2d 373, 375 (Fla. 1961): Misuse of funds for unlawful acts is malfeasance.
   - *Thompson v. Dade County*, 212 So. 2d 433, 435 (Fla. 3d DCA 1968): Defense limited to good-faith acts.

B. Ethical Conflicts

8. **Rule 4-1.7, Fla. Bar**: County attorneys cannot represent Appellees in personal-capacity fraud claims while serving the public, creating a conflict (*Young v. Achenbauch*, 136 So. 3d 575, 580 (Fla. 2014)).

9. **Rule 4-1.11**: Defending misconduct breaches duties to the public as former client (*State v. Fitzpatrick*, 464 So. 2d 1185 (Fla. 1985)).

C. Criminal Exposure

10. Pending grand jury requests (Petition, ¶¶ 7-8) and allegations (18 U.S.C. §§ 1341, 1343; § 838.022, Fla. Stat.) preclude public defense until resolved (*Lomax v. City of Miami*, 964 So. 2d 156, 158 (Fla. 3d DCA 2007)).

III. ANTICIPATING DEFENSE ARGUMENTS AND RESPONSES

11. **"Official Capacity Entitlement"**: False. Fraud and felonies are not official acts (§ 111.07; *Nuzum*, 455 So. 2d at 917).

12. **"Routine Civil Defense"**: Misleading. Criminal fraud (Petition, ¶¶ 14-16) exceeds negligence; public funds are barred (AGO 91-85).

13. **"Good-Faith Actions"**: False. 415,728 illegal ballots and grand jury inaction (Motion for Judicial Notice, ¶¶ 7-8) show ultra vires misconduct (*Brautigam*, 138 So. 2d at 375).

14. **"No Conflict"**: Untrue. County attorneys' dual role violates Rule 4-1.7 (*Young*, 136 So. 3d at 580).

15. **"Motion Untimely"**: Baseless. Fraud evidence emerged in 2025 filings (Petition, March 12); timely raised now.

IV. RELIEF REQUESTED

WHEREFORE, Appellant requests:

1. Disqualify Jared N. Kahn and Kelly L. Wicari as counsel for Appellees;

2. Order Appellees to retain private counsel at their expense;

3. Declare taxpayer-funded representation unlawful under § 1111.07;

4. Stay proceedings pending compliance (Rule 9.310(a));

5. Award costs per § 57.105, Fla. Stat., if defense persists;

6. Grant further relief as just.

Dated: March 13, 2025

/s/ Christopher Gleason
Christopher Gleason
1628 Sand Key Estates Court
Clearwater, FL 33767
Phone: 727-480-2059
Email: epgleason72@gmail.com , gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I certify that a true copy was furnished via E-Filing Portal on March 13, 2025, to: Clerk, Second District Court of Appeal; Clerk, Sixth Judicial Circuit, Pinellas County; Jared N. Kahn, Esq. (jkahn@pinellas.gov); Kelly L. Vicari, Esq. (kvicari@pinellas.gov); FSE Inc. (via registered agent or general counsel).
/s/ Christopher Gleason

CERTIFICATE OF COMPLIANCE

This petition complies with Rule 9.045(e), using 14-point Times New Roman.
/s/ Christopher Gleason

EXHIBITS

- **Exhibit G**: Pinellas County Attorney's Office Employment Record (or affidavit confirming Kahn/Vicari's status).

EXHIBIT G:

Florida Bar Records Confirming Kahn/Vicari's status

as Pinellas County Employed Attorneys

DIRECTORIES

Lawyer Directory

Authorized House Counsels

Certified Foreign Legal Consultants

Law Faculty Affiliates

Florida Registered Paralegals

Courts

Legal Groups

Judicial Nominating Commissions

Jared Douglas Kahn

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:	1052776
Mail Address:	Pinellas County Attorney's Office 315 Court St Clearwater, FL 33756-5165 Office: (727) 464-3354
Email:	jkahn@pinellas.gov
Personal Bar URL:	https://www.floridabar.org/mybarprofile/1052776
vCard:	
County:	Pinellas
Circuit:	06
Admitted:	09/27/2013
10-Year Discipline History:	None
Law School:	John Marshall Law School
Sections:	City, County & Local Govt Law Trial Lawyers
Practice Areas:	City/County/Local Government Civil Trial Criminal Trial
Federal Courts:	U.S. Court of Appeals for the Eleventh Circuit U.S. District Court, Middle District of Florida U.S. District Court, Northern District of Florida U.S. District Court, Southern District of Florida
State Courts:	District Of Columbia
Firm:	Pinellas County Attorney's Office
Firm Size:	21-30
Firm Position:	Government attorney

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Kelly Lynn Vicari

Member in Good Standing | Eligible to Practice Law in Florida

Bar Number:	88704
Mail Address:	Pinellas County Attorney's Office 315 Court St Clearwater, FL 33756-5165 Office: 727-464-3354 Cell: 727-464-3354 - No Text Messages
Email:	kvicari@pinellascounty.org
Personal Bar URL:	https://www.floridabar.org/mybarprofile/88704
vCard:	
County:	Pinellas
Circuit:	06
Admitted:	04/14/2011
10-Year Discipline History:	None
Law School:	Florida Coastal School of Law, 2010

Board Certifications:

Area	Year
City, County and Local Government Law	2019

Sections:	City, County & Local Govt Law
Practice Areas:	City/County/Local Government Civil Litigation Workers' Compensation/Defense
Federal Courts:	Florida Middle District Bankruptcy Court US District Court, Middle District of Florida US District Court, Northern District of Florida
Firm Position:	Government attorney

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IN THE SECOND DISTRICT COURT OF APPEAL
STATE OF FLORIDA

CHRISTOPHER GLEASON

Appellant/Petitioner,

vs.

JULIE MARCUS, et. al.,

Appellees/Respondents

Case No. 2D2024-2687; 2D2024-2688

L.T. Case No. 522024CA003717; 522024CA003995

AMENDED AND SUPPLEMENTED MOTION TO DISQUALIFY COUNTY ATTORNEYS AND BAR USE OF TAXPAYER FUNDS FOR DEFENSE

COMES NOW, Appellant Christopher Gleason, pro se, and respectfully moves this Honorable Court to disqualify Attorneys Kelly Vicari, Jared Kahn, Jeffrey Klein, and all other attorneys from the Pinellas County Attorney's Office from representing Appellees in this matter, and to prohibit the use of public funds for their defense. This motion is based on disqualifying conflicts of interest, ethical violations, unlawful public expenditures, and structural due process violations arising from an alleged vote-by-mail (VBM) fraud scheme. The motion is brought pursuant to Florida Rule of Appellate Procedure 9.300; Florida Statutes §§ 111.07, 104.0616, 104.13, 838.022, 97.0585, 119.07; 18 U.S.C. §§ 1341, 1343; 52 U.S.C. §

20511.; Florida Rules of Professional Conduct 4-1.7,, 4-3.7,, 4-1.10, 4-3.4,, 4-8.4; and controlling case law.

I. FACTUAL BASIS FOR DISQUALIFICATION AND RELIEF REQUESTED

1. On June 23, 2024, 219,673 VBM ballots were illegally requested in Pinellas County, followed by 196,055 on September 9, 2024, without the voter having provided the statutory required identification verification upon request, violating Fla. Stat. § 101.62(1)(b), as evidenced by Florida Division of Elections VBM reports (Exhibit B, EXHIBITS A_Q.pdf; Exhibit B, attached). This mass-scale fraud undermines the 'right to vote' and 'equal protection' in the 'manner of its exercise,' per *Bush v. Gore*, 531 U.S. 98, 104-05 (2000), and necessitates disqualification and transparency.

2. These mail ballot requests included ballots for one unprotected voter, Jeffrey Klein, whose record was misused as part of systemic Florida Voter Registration System (FVRS) manipulation, and two protected voters, County Attorney Jared Kahn and Branden M. Vicari, the husband of County Attorney Kelly Vicari, as shown in VBM reports (Exhibit B,, attached). A marriage record confirms Vicari's spousal connection (Exhibit A). Due to their protected status under Fla. Stat. § 97.0585, Kahn and Vicari were procedurally unable

to request VBM ballots online, as confirmed by a screenshot of the protected voter lock on the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov, Exhibit C, Exhibit G) and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf).

3. The unauthorized VBM requests, flagged as "N/N" (no ID provided) includes a Sunday submission on June 23, 2024, when the Supervisor of Elections' office was closed (Exhibit C, EXHIBITS A_Q.pdf). This constitutes prima facie evidence of and internal control override of election system fraud protections, false entry into official election records, and VBM fraud, as detailed in Appellant's affidavit (Exhibit D, attached). The "N/N" status and Sunday submission refute claims of legitimate requests, as no authorized mechanism existed for these submissions.

4. Attorneys Kahn and Klein, who represent Appellees, are material witnesses to, victims of, participants in, and/or beneficiaries of the alleged election fraud, as their voter records were misused (Exhibit B), creating disqualifying conflicts under Rule 4-3.7 (lawyer as witness) and Rule 4-1.7 (personal interest), Florida Rules of Professional Conduct. Their roles as government attorneys at the

Pinellas County Attorney's Office are confirmed by Florida Bar profiles (Exhibit F).

5. Attorney Vicari, whose husband Branden M. Vicari was also affected (Exhibits A, B), is personally entangled in the misconduct, creating a direct and substantial conflict of interest due to her spousal relationship. See *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009).

6. The County Attorneys sought to seal all exhibits, including official election records, VBM reports (Exhibit B) and publicly available public records and material widely available on the internet, to conceal any evidence of fraud implicating defendants, themselves, Vicari's husband, and judicial officers (Exhibit O, EXHIBITS A_Q.pdf), as evidenced by Jared Kahn's email and draft sealing order (Exhibit E, Pages 21-22). The resulting court orders (Exhibit E, Pages 23-27), granted by Judge Patricia Muscarella, are overbroad, encompassing non-exempt records without specific exemptions, violating Fla. Stat. § 119.07. This demonstrates bad faith under Fla. Stat. § 111.07, as *Times Publishing Co. v. Burke*, 375 So. 2d 297, 300 (Fla. 2d DCA 1979), and *Watt v. Florida Power & Light Co.*, 372 So. 2d 420, 424 (Fla. 1979), mandate narrowly tailored restrictions.

7. The Supervisor of Elections' office obstructed lawful requests for forensic audit data, claiming production of the requested data would take 19,000 hours to complete (Exhibit N, EXHIBITS A_Q.pdf), displaying a pattern of concealment consistent with the sealing effort (Exhibit E), implicating internal use of override credentials to falsify records, and establishing willful and knowing prima facie evidence of Official Misconduct a violation of 838.022 F.S.

8. Multiple judicial officers, including trial judges and assistants, had their protected VBM statuses overridden (Exhibit O), as corroborated by the VBM reports and protected voter lock system in place (Exhibits B, C), indicating a systemic misconduct reaching the judiciary. The sealing orders by Judge Patricia Muscarella (Exhibit E, Pages 23-27), potentially influenced by conflicted attorneys (Exhibits B, F), further taint the tribunal. This entanglement violates the *'basic requirement of due process'* for a *'fair trial in a fair tribunal,"* as held in *In re Murchison*, 349 U.S. 133, 136 (1955), and *Berger v. United States*, 295 U.S. 78, 85 (1935), necessitating recusal to prevent *"even the probability of unfairness."*

9. This widespread misconduct establishes a cascade conflict, a systemic failure and structural error where attorneys,

election officials, and judicial officers are entangled as victims of, witnesses to, and/or participants, and/or beneficiaries of the same fraud, rising to a structural due process violation that dwarfs the structural errors per *Rogers v. State*, 630 So. 2d 513 (Fla. 1993), and aligns with *Williams v. Pennsylvania*, 579 U.S. 1, 8-9 (2016), which held '*an unconstitutional potential for bias*' creates a structural defect, and (*Young v. United States*, 481 U.S. 787, 803-04 (1987)), requiring disqualification for conflicted counsel.

II. VIOLATIONS OF FLORIDA LAW, FEDERAL LAW, AND BAR RULES

10. Under F.S. § 111.07, public officials are not entitled to taxpayer-funded defense if they act in bad faith or outside their duties. The County Attorneys' sealing of public VBM reports (Exhibit E) and representation, despite personal entanglement (Exhibits A, B, F), demonstrate bad faith, disqualifying the use of public funding. See *Thornber v. City of Fort Walton Beach*, 568 So. 2d 914 (Fla. 1990) and *Lomax v. City of Miami*, 977 So. 2d 677, 679 (Fla. 3d DCA 2008), which held that Fla. Stat. § 111.07 does not authorize funding for bad-faith actions that "*do not serve a public purpose.*"

11. The unauthorized VBM requests for Kahn, Klein, and Vicari's husband (Exhibit B), which has been confirmed as an

impossibility for protected voters, as shown by the protected voter lock on the Supervisor of Elections' website (Exhibit C, Exhibit G), violate F.S. §§ 104.0616 (VBM fraud), 104.13 (false returns), and 838.022 (official misconduct), as well as 18 U.S.C. §§ 1341, 1343 (wire/mail fraud) and 52 U.S.C. § 20511 (federal election fraud).

12. The override of voters with protected status (Exhibits A, B, C, G), is in violation of Fla. Stat. § 97.0585, because confidential voter records were accessed without authorization, constituting:

(a) A civil claim under Fla. Stat. § 119.07 for record manipulation, exacerbated by sealing (Exhibit E);

(b) A criminal charge under Fla. Stat. § 104.13 for false returns;

(c) A violation of F.S. § 838.022 for official misconduct;

13. The sealing effort (Exhibit E, Pages 21-27) violates Fla. Stat. § 119.07 by obstructing access to non-exempt VBM reports (Exhibit B), ignoring redaction options under Fla. Stat. § 119.07(2)(b), and demonstrating an intent to conceal fraud, as evident in Jared Kahn's email (Exhibit E, Page 21) which sought to seal all exhibits despite discussing only Exhibit G. This disqualifies the use of public funding for attorneys under Fla. Stat. § 111.07, and violates Rule 4-

8.4 (misconduct). *Times Publishing Co. v. Burke*, 375 So. 2d 297, 300 (Fla. 2d DCA 1979), mandates that restrictions be "*narrowly tailored*," and *Wait v. Florida Power & Light Co.*, 372 So. 2d 420, 424 (Fla. 1979), emphasizes the public's right to inspect records, rendering the sealing order impermissible.

14. **Under the Florida Rules of Professional Conduct:**

(a) **Rule 4-1.7 bars representation when personal interests, such as those identified with Kahn, Klein, and Vicari's entanglement (Exhibits A, B, F), materially limit advocacy. Even if unaware, their witness status (Exhibit B) and sealing effort (Exhibit E) demonstrate a personal stake, as *Young v. United States*, 481 U.S. 787, 803-04 (1987), warned that '*counsel's personal interest in the outcome*' impairs fairness, requiring disqualification.**

(b) **Rule 4-3.7 prohibits Kahn and Klein from serving as advocates, as their VBM records make them material witnesses (Exhibit B). *Andersom v. State*, 420 So. 2d 574, 576 (Fla. 1982), mandates disqualification when an attorney's testimony compromises judicial integrity, a principle applicable to their dual roles.**

(c) Rule 4-1.10 imputes conflicts with all County Attorneys, as the pervasive fraud (Exhibits B, C) and sealing effort (Exhibit E) preclude impartial representation in this small office (21-50 attorneys, Exhibit F). *State v. Michaels*, 454 So. 2d 560, 562 (Fla. 1984), held that conflicts in small firms are imputed due to the close professional relationships.

(d) Rule 4-3.4(a) was breached by obstructing evidence through the sealing of exhibits (Exhibit E).

(e) Rule 4-8.4, which involves dishonesty and prejudice to justice, was also violated due to the sealing of exhibits (Exhibit E).

13. In *Moakley v. Smallwood*, 826 So. 2d 221 (Fla. 2002), the Florida Supreme Court upheld sanctions for litigation conduct which undermined judicial integrity, a close parallel applicable to the sealing of exhibits in this case (Exhibit E).

14. *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009) holds that the probability of bias by attorneys who are entangled as witnesses (Exhibits A, B, F), is constitutionally intolerable.

15. *Tumey v. Ohio*, 273 U.S. 510 (1927) establishes that a personal interest, such as Vicari's spousal conflict (Exhibit A), violates the Fourteenth Amendment.

16. *Rogers v. State*, 630 So. 2d 513 (Fla. 1993) confirms that cumulative bias, as evidenced by the attorneys' conflicts and sealing actions (Exhibits A, B, C, E, F), constitutes structural error, not subject to harmless-error review.

III. SYSTEMIC CASCADE CONFLICT AND STRUCTURAL ERROR BREAKDOWN

17. This case presents a cascade conflict, a systemic failure where County Attorneys (Exhibits A, B, F), election officials (Exhibit N), and judicial officers (Exhibit O) are entangled as victims of, witnesses to, and/or participants in, and/or beneficiaries of the same VBM fraud, as confirmed by the protected voter lock (Exhibit C, Exhibit G) and sealing effort (Exhibit E). Table 1 summarizes this entanglement. As *Williams v. Pennsylvania*, 579 U.S. 1, 8-9 (2016), articulated, '*an unconstitutional potential for bias exists when the same person serves as both accuser and adjudicator,*' necessitating disqualification.

18. Table 1: Cascade Conflict Entanglement:

Party	Role	Conflict Evidence	Exhibit	Legal Basis
Kelly Vicari	County Attorney	Spousal conflict via husband's VBM misuse	A, B, F	Rule 4-1.7, Caperton
Jared Kahn	County Attorney	Witness/victim via VBM misuse, sealing proponent	B, E, F	Rule 4-3.7, Young
Jeffrey Klein	County Attorney	Witness/victim via VBM misuse	B, F	Rule 4-3.7, Young
County Attorney's Office	Counsel	Imputed conflict in small office	F, O	Rule 4-1.10, Michaels
Election Officials	Defendants	Audit obstruction, fraud facilitation	N	F.S. § 104.0616
Judicial Officers	Tribunal	VBM status overrides	O	In re Murchison, Berger

19. The sealing of public records (Exhibit E, Pages 21-27) obstructs the tribunal's ability to evaluate systemic fraud, undermining judicial neutrality and reflecting an institutional collapse of ethical safeguards. The overbroad court orders (Exhibit E, Pages 23-27), influenced by conflicted attorneys (Exhibits B, F), exacerbate this cascading conflict, necessitating

vacatur; see *Times Publishing Co. v. Burke*, 375 So. 2d 297, 300 (Fla. 2d DCA 1979).

20. This entanglement violates the constitutional guarantee of due process under the Florida Constitution (Article I, § 9) and U.S. Constitution (Fourteenth Amendment), threatening the impartiality of the tribunal itself. *In re Murchison*, 349 U.S. 133, 136 (1955), mandated an '*absence of actual bias*' and prevention of '*the probability of unfairness*,' and *Berger v. United States*, 295 U.S. 78, 85 (1935), requires avoiding any '*appearance of bias*' to maintain public confidence, thus necessitating the disqualification of conflicted attorneys, and recusal of affected judicial officers (Exhibit G).

21. Judicial recusal and attorney disqualification are constitutionally mandated to preserve the integrity of these proceedings, as held in *Caperton* and *Turney*.

22. The cascade conflict, exacerbated by the sealing efforts (Exhibit E), undermines public confidence and violates Appellant's right to a neutral tribunal. By compromising electoral integrity, this misconduct threatens the "*equal protection*" of voting rights, as *Bush v. Gore*, 531 U.S. 98, 104-05 (2000), warned against "*arbitrary and*

disparate treatment' in vote processing, dwarfing the trial-specific bias in *Rogers*.

IV. PRAYER FOR RELIEF

WHEREFORE, Appellant respectfully requests this Court:

1. **Disqualify Kelly Vicari, Jared Kahn, Jeffrey Klein, and all attorneys affiliated with the Pinellas County Attorney's Office, from representing Appellees, due to their conflicts of interest (Exhibits A, B, C, E, F).**

2. Bar the use of taxpayer funds for Appellees' defense, as their ultra vires, criminal, and bad-faith misconduct (Exhibits B, E) violates Fla. Stat. § 111.07.

3. **Refer these matters to the Florida Bar for investigation and discipline of violations to Rules 4-1.7, 4-3.7, 4-1.10, 4-3.4, 4-8.4 (Exhibits A, B, E, F).**

4. **Direct the immediate production of the VR Systems Voter Focus audit logs, voter override logs, forensic election data, and full 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports from the Florida Division of Elections (Exhibit B, Exhibit N), to confirm the protected voter manipulation which occurred, and the unauthorized VBM requests for Brandon M. Vicari,**

Jared Kahn, and Jeffrey Klein, because the Supervisor of Elections' obstruction (19,000-hour estimate, Exhibit N), prevents access to critical evidence.

5. Deny or vacate any orders sealing exhibits, as such actions obstruct public access to evidence of fraud (Exhibits B, E) and violate Fla. Stat. § 119.07.

6. **Grant such other relief as this Court deems just and proper.**

V. CERTIFICATE OF GOOD FAITH

I HEREBY CERTIFY that this motion is filed in good faith, based on newly discovered evidence (Exhibits A, B, C, E, F, G) and prior filings (Exhibits A-Q, EXHIBITS A_Q.pdf), and is not for purposes of delay.

VI. LIST OF EXHIBITS

1. **Exhibit A: Marriage Record for Kelly Vicari:** A copy of the marriage record from the Pinellas County Clerk of Court website, dated November 8, 2014 (I#: 2014315203, BK: 18589 PG: 976, recorded 11/13/2014), confirming that Kelly Vicari (formerly Kelly Lynn Lewis) is married to Brandon M. Vicari. This record establishes Vicari's spousal connection to a protected voter whose unauthorized

VBM requests on June 23, 2024, and September 9, 2024, create a disqualifying conflict under Rule 4-1.7 and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), as detailed in ¶¶ 5, 9 of the motion.

2. **Exhibit B**: VBM Election Reports Naming Vicari's Husband, Kahn, and Klein: **Excerpts from the 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports, obtained from the Florida Department of State, Division of Elections** at https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports, pursuant to Florida Rule 1S-2.043, Rule 1S-2.055, and Fla. Stat. § 101.62. The reports, partially included due to ongoing production delays by the Supervisor of Elections (Exhibit N), are intended to show the unauthorized VBM requests for Branden M. Vicari, Jared Kahn, and Jeffrey Klein, on June 23, 2024, and September 9, 2024, flagged as "N/N" (no identification provided), violating Fla. Stat. § 101.62(1)(b). These requests, part of the 219,673 and 196,055 illegal VBM ballot requests, confirm the attorneys' status as material witnesses and/or victims, necessitating their disqualification under Rule 4-3.7 and Rule 4-1.10, as alleged in ¶¶ 1-5, 9. Full reports are requested per ¶ D.

3. **Exhibit C:** Screenshot of the lock placed on Protected Voters on Pinellas County Supervisor of Elections Website: A screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov), captured on April 11, 2025, by John Siamas using Zight Screen Capture (Exhibit G), showing how a protected voter cannot request a VBM ballot online. VBM requests for protected voters, as mandated by Fla. Stat. § 97.0585 and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf). The screenshot displays a *"Protected"* **status or error message**, confirming that requests for Branden M. Vicari and Jared Kahn were technically impossible without fraud or manual override, all which support the fraud allegations and attorneys' conflicts in ¶¶ 2-4, 9.

4. **Exhibit D:** Affidavit of Christopher Gleason: An affidavit by Appellant Christopher Gleason, dated April 28, 2025, attesting to the acquisition and authenticity of Exhibits A, B, C, E, F, G, and their relevance to the alleged VBM fraud involving voters whose information is protected, including Branden M. Vicari, Jared Kahn, and Jeffrey Klein. The affidavit confirms the marriage record's link to Vicari, the VBM reports' evidence of unauthorized requests, the screenshot's demonstration of the restriction placed on protected

voters, the sealing of exhibits/court records as attempted obstruction, and the attorneys' roles, all which support the motion's claims in ¶¶ 1-9.

5. **Exhibit E:** County Attorneys' Drafted Order and Court Orders to Seal Exhibits: A copy of the County Attorneys' draft sealing order, dated September 20, 2024, attached to Jared Kahn's email (Exhibit E, Pages 21-22), and court orders by Judge Patricia Muscarella (Exhibit E, Pages 23-27), requesting and granting the sealing of all exhibits in Case No. 522024CA003995XXCICI, including public election records (Exhibit B). These actions violate F.S. § 119.07 by obstructing access to non-exempt records and demonstrate bad faith under F.S. § 111.07, as alleged in ¶¶ 6, 9, reinforcing the need for disqualification and the prohibition of public funds for Defendant's legal fees.

6. **Exhibit F:** Florida Bar Member Profiles for Kelly Vicari, Jared Kahn, and Jeffrey Klein: Screenshots from the Florida Bar website (https://www.floridabar.org), captured April 24, 2025, confirming Kelly Vicari (Bar #887704), Jared Kahn (Bar #1052276), and Jeffrey Klein (Bar #1025117) as government attorneys at the Pinellas County Attorney's Office (315 Court St, Clearwater, FL). These

profiles verify their roles, practice areas (City/County/Local Government Law), and office size (21-50 attorneys), supporting their disqualification under Rule 4-1.7, Rule 4-3.7, and imputed disqualification under Rule 4-1.10, as alleged in ¶¶ 4-5, 9, 14.a-c.

7. **Exhibit G:** Affidavit of John Siamas: Affidavit of John Siamas, dated April 28, 2025, attesting to the capture of a screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov) on April 11, 2025, using Zight Screen Capture. The affidavit confirms the screenshot's authenticity, showing a '*Protected*' status error message blocking online VBM requests for protected voters, as mandated by Fla. Stat. § 97.0585, supporting fraud allegations and attorney conflicts in ¶¶ 2-4, 9.

Dated: April 28, 2025

Respectfully submitted,

/s/ Christopher Gleason

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Phone: 727-480-2059
Email: gleasonforpinellas@gmail.com

I HEREBY CERTIFY that a true and correct copy of the foregoing, along with Exhibits A, B, C, D, E, F, G, was furnished via email and the Florida Courts E-Filing Portal on April 24, 2025, to:

Clerk of the Second District Court of Appeal

Julie Marcus, Supervisor of Elections, Pinellas County

Dustin Chase, Deputy Supervisor of Elections

Matt Smith, General Counsel, Supervisor of Elections

Bruce Bartlett, Pinellas County State Attorney

Kelly L. Vicari, Esq., Jared Kahn, Esq., Jeffrey Klein, Esq.;
Attorneys for Appellees

/s/ Christopher Gleason

IV. NOTARY ACKNOWLEDGMENT

[AFFIANT SIGNATURE]

Sworn to and subscribed before me by means of ✓ physical presence or ____ online notarization, this 28 day of April 2025, by CHRISTOPHER GLEASON.

Notary Public – State of Florida

SCOTT SUPRENANT
Notary Public
State of Florida
Comm# HH506057
Expires 7/14/2028

[PRINT, TYPE, OR STAMP NAME OF NOTARY PUBLIC]

Personally Known ____ OR Produced Identification ✓ [CHECK ONE]

Exhibit A

Marriage Record for Kelly Vicari

A copy of the marriage record obtained directly from the Pinellas County Clerk of Court website, dated November 8, 2014, confirming that Kelly Vicari is married to Branden M. Vicari. The record is authentic and unaltered and recorded as I#:2014315203 BK: 18589 PG:976, 11/13/2014 at 02:15 PM by KEN BURKE. This record establishes Vicari's spousal connection to a protected voter whose unauthorized VBM requests on June 23, 2024, and September 9, 2024, create a disqualifying conflict under Rule 4-1.7 and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), as detailed in ¶¶ 5, 8 of the motion.

I#: 2014315203 BK: 18589 PG: 976,, 11//13//2014 at 02::15 PM,, RECORDING 1 KEN BURKE, CLERK OF COURT AND COMPTROLLER PINELLAS COUNTY,, FL BY DEPUTY CLERK: CLKPR03

Department of Health • Vital Statistics

STATE OF FLORIDA
MARRIAGE RECORD

TYPE IN UPPER CASE
USE BLACK INK

This license not valid unless seal of Clerk, Circuit or County Court appears thereon.

(STATE FILE NUMBER)

2014 ML 2891182
(APPLICATION NUMBER)

APPLICATION TO MARRY

1. GROOM'S NAME (First, Middle, Last)			2. DATE OF BIRTH (Month, Day, Year)
BRANDEN MICHAEL VICARI			12/09/1984
3a. RESIDENCE - CITY, TOWN, OR LOCATION	3b. COUNTY	3c. STATE	4. BIRTHPLACE (State or Foreign Country)
PALM HARBOR	PINELLAS	FL	NY
5a. BRIDES NAME (First, Middle, Last)	5b. MAIDEN SURNAME (If different)		6. DATE OF BIRTH (Month, Day, Year)
KELLY LYNN LEWIS	LEWIS		08/23/1986
7a. RESIDENCE - CITY, TOWN, OR LOCATION	7b. COUNTY	7c. STATE	8. Birthplace (State or Foreign Country)
PALM HARBOR	PINELLAS	FL	MI

WE THE APPLICANTS NAMED IN THIS CERTIFICATE, EACH FOR HIMSELF OR HERSELF, STATE THAT THE INFORMATION PROVIDED ON THIS RECORD IS CORRECT TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THAT NO LEGAL OBJECTION TO THE MARRIAGE NOR THE ISSUANCE OF A LICENSE TO AUTHORIZE THE SAME IS KNOWN TO US AND HEREBY APPLY FOR LICENSE TO MARRY.

9. SIGNATURE OF GROOM (Sign full name using black ink)	10. SUBSCRIBED AND SWORN TO BEFORE ME ON (DATE)
> [signature]	10/13/2014
11. TITLE OF OFFICIAL	12. SIGNATURE OF OFFICIAL (Use black ink)
DEPUTY CLERK	> [signature]
13. SIGNATURE OF BRIDE (Sign full name using black ink)	14. SUBSCRIBED AND SWORN TO BEFORE ME ON (DATE)
> [signature]	10/13/2014
15. TITLE OF OFFICIAL	16. SIGNATURE OF OFFICIAL (Use black ink)
DEPUTY CLERK	> [signature]

LICENSE TO MARRY

AUTHORIZATION AND LICENSE IS HEREBY GIVEN TO ANY PERSON DULY AUTHORIZED BY THE LAWS OF THE STATE OF FLORIDA TO PERFORM A MARRIAGE CEREMONY WITHIN THE STATE OF FLORIDA AND TO SOLEMNIZE THE MARRIAGE OF THE ABOVE NAMED PERSONS. THIS LICENSE MUST BE USED ON OR AFTER THE EFFECTIVE DATE AND ON OR BEFORE THE EXPIRATION DATE IN THE STATE OF FLORIDA IN ORDER TO BE RECORDED AND VALID.

17. COUNTY ISSUING LICENSE	18. DATE LICENSE ISSUED	18a. DATE LICENSE EFFECTIVE	19. EXPIRATION DATE
PINELLAS	10/13/2014	10/16/2014	12/15/2014

20a. SIGNATURE OF COURT CLERK OR JUDGE	20b. TITLE	20c. BY D.C.
> [signature]	CLERK OF THE CIRCUIT COURT AND COMPTROLLER	DLF

CERTIFICATE OF MARRIAGE

I HEREBY CERTIFY THAT THE ABOVE NAMED GROOM AND BRIDE WERE JOINED BY ME IN MARRIAGE IN ACCORDANCE WITH THE LAWS OF THE STATE OF FLORIDA.

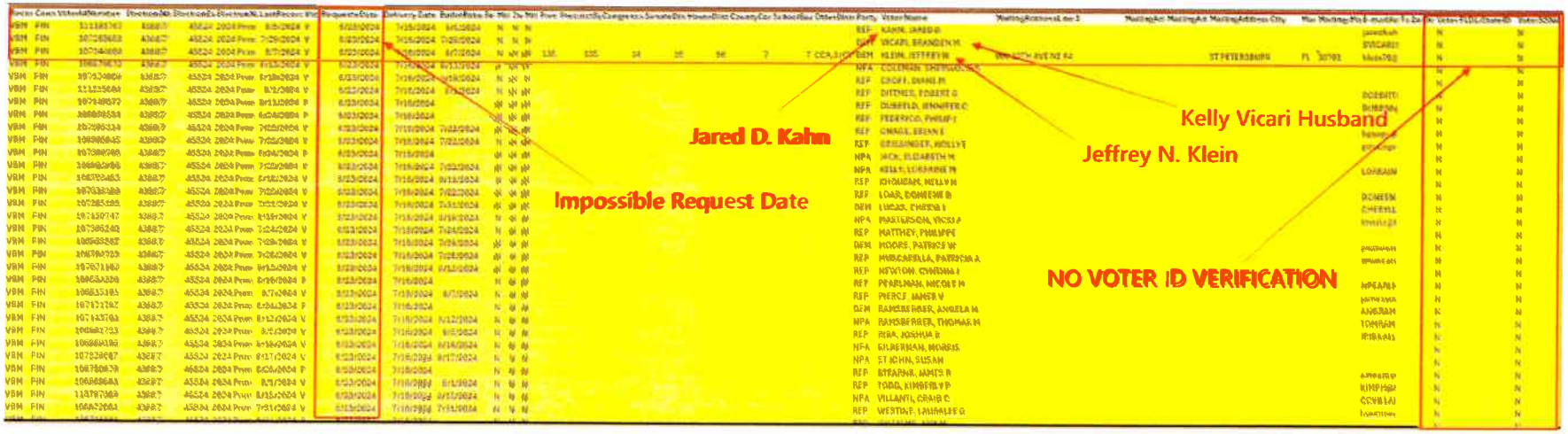
21. DATE OF MARRIAGE (Month, Day, Year)	22. CITY, TOWN, OR LOCATION OF MARRIAGE
Oct. 8, 2014	TAMPA, FLORIDA
23a. SIGNATURE OF PERSON PERFORMING CEREMONY (Use black ink)	23c. ADDRESS (Of person performing ceremony)
> [signature]	2686 BAYSHORE BLVD. DUNEDIN FL
23b. NAME AND TITLE OF PERSON PERFORMING CEREMONY (Type or Print)	24. SIGNATURE OF WITNESS TO CEREMONY (Use black ink)
REV. DR. JERRY J. BROWNLOW	> [signature]
	25. SIGNATURE OF WITNESS TO CEREMONY (Use black ink)
	> [signature]

Exhibit B:

VBM Election Reports Naming Vicari's Husband, Kahn, and Klein
Excerpts from the 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports, obtained from the Florida Department of State, Division of Elections at https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports, pursuant to Florida Rule 1S-2.043, Rule 1S-2.055, and F.S. § 101.62. The reports show unauthorized VBM requests for Branden M. Vicari, Jared Kahn, and Jeffrey Klein on June 23, 2024, and September 9, 2024, flagged as "N/N" (no identification verification), violating F.S. § 101.62(1)(b). These requests, part of 219,673 and 196,055 illegal requests, confirm the attorneys' status as material witnesses or victims, necessitating disqualification under Rule 4-3.7 and Rule 4-1.10, as alleged in ¶¶ 1-5, 8.

AUGUST 20, 2024 PRIMARY ELECTION

VOTE BY MAIL EARLY VOTING REPORT EXTRACT



NOVEMBER 2024 GENERAL ELECTION

VOTE BY MAIL EARLY VOTING REPORT EXTRACT

Exhibit C:

Screenshot of Protected Voter Lock on Pinellas County Supervisor of Elections Website
A screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov), captured on April 10, 2025, showing the protected voter lock mechanism that blocks online VBM requests for protected voters, as mandated by F.S. § 97.0585 and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf). The screenshot displays a "Protected" status or error message, confirming that requests for Branden M. Vicari, Kahn, and Klein were technically impossible without fraud or manual override, supporting the fraud allegations and attorneys' conflicts in ¶¶ 2-4, 8.

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Protected Voter Message

Select Language

Powered by Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

Exhibit D:

Affidavit of Christopher Gleason
An affidavit by Appellant Christopher Gleason, dated April 24, 2025, attesting to the acquisition and authenticity of Exhibits A, B, C, and E, and their relevance to the alleged VBM fraud involving protected voters Branden M. Vicari, Jared Kahn, and Jeffrey Klein. The affidavit confirms the marriage record's link to Vicari, the VBM reports' evidence of unauthorized requests, the screenshot's demonstration of protected voter restrictions, and the sealing attempt's obstruction, supporting the motion's claims in ¶¶ 1-8.

STATE OF FLORIDA
COUNTY OF PINELLAS

AFFIDAVIT OF CHRISTOPHER GLEASON REGARDING AMENDED AND SUPPLEMENTED MOTION TO DISQUALIFY COUNTY ATTORNEYS AND BAR USE OF TAXPAYER FUNDS FOR DEFENSE

BEFORE ME, the undersigned authority, personally appeared Christopher Gleason, who, being duly sworn, deposes and says:

1. I am the Appellant/Petitioner in Case Nos. 2D2024-2687 and 2D2024-2688, pending in the Second District Court of Appeal of Florida, and the Plaintiff in the lower court proceedings, Case Nos. 522024CA003717XXCICI and 522024CA003995XXCICI, in the Circuit Court of the Sixth Judicial Circuit, Pinellas County, Florida. I am over 18 years of age, competent to testify, and have personal knowledge of the facts stated herein.

2. I submit this affidavit in support of my Amended and Supplemented Motion to Disqualify County Attorneys and Bar Use of Taxpayer Funds for Defense, filed in the above-captioned cases, to attest to the acquisition, authenticity, and

relevance of Exhibits A, B, C, and E, which demonstrate conflicts of interest, ethical violations, and systemic vote-by-mail (VBM) fraud involving protected voters Branden M. Vicari, Jared Kahn, and Jeffrey Klein, as alleged in paragraphs 1-8 of the motion.

3. **Exhibit A: Marriage Record for Kelly Vicari**

On 04/24/2025, I obtained a copy of the marriage record for Kelly Vicari formerly Kelly Lynn Lewis, from the Pinellas County Clerk of Court website, confirming that she is married to Branden Michael Vicari. The record is authentic and unaltered and recorded as I#:2014315203 BK: 18589 PG:976, 11/13/2014 at 02:15 PM by KEN BURKE. This exhibit establishes Vicari's spousal connection to a protected voter whose unauthorized VBM requests on June 23, 2024, and September 9, 2024, create a disqualifying conflict of interest under Rule 4-1.7, Florida Rules of Professional Conduct, and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), as detailed in paragraphs 5 and 8 of the motion.

4. **Exhibit B: VBM Election Reports Naming Vicari's Husband, Branden M. Vicari, Kahn, and Klein**

I personally accessed and downloaded excerpts from the 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports from the Florida Department of State, Division of Elections, at https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports, pursuant to Florida Rule 1S-2.043, Rule 1S-2.055, and F.S. § 101.62. These reports are authentic official election records and public records showing unauthorized VBM requests for Branden M. Vicari, Jared Kahn, and Jeffrey Klein on June 23, 2024, and September 9, 2024, flagged as "N/N" (no identification verification), in violation of F.S. § 101.62(1)(b). The requests, part of 219,673 and 196,055 illegal requests, confirm the attorneys' status as material witnesses or victims, necessitating disqualification under Rule 4-3.7 and Rule 4-1.10, as alleged in paragraphs 1-5 and 8 of the motion.

5. **Exhibit C: Screenshot of Protected Voter Lock on Pinellas County Supervisor of Elections Website**

On or about April 10, 2025 I was with John Siamus who captured a screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov) using Zight Screen Capture. The screenshot is authentic, unaltered. It displays the protected voter lock mechanism, showing a "Protected" status or error message that blocks online VBM requests for protected voters, as mandated by F.S. § 97.0585 and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf). This exhibit confirms that VBM requests for Branden M. Vicari, and Jared D. Kahn, and Klein were technically impossible without fraud or manual override, supporting the fraud allegations and attorneys' conflicts in paragraphs 2-4 and 8 of the motion.

6. **Exhibit E: County Attorneys' Motion to Seal Exhibits**

On 04//24//2025, I obtained a copy of the court order drafted by County Attorneys, dated [Insert Date of Motion], requesting to seal all exhibits in Case Nos. 522024CA003995XXCICI,

including public VBM reports (Exhibit B). The document is authentic, as obtained from [Specify Source, e.g., court docket, opposing counsel]. The sealing attempt violates F.S. § 119.07 by obstructing access to non-exempt records and demonstrates bad faith under F.S. § 111.07, as it seeks to conceal evidence of fraud implicating the attorneys, Branden M. Vicari, and judicial officers (Exhibit O, EXHIBITS A_Q.pdf), as alleged in paragraphs 6 and 8 of the motion.

7. The above exhibits are directly relevant to the motion's claims:

   a. Exhibit A confirms Vicari's personal conflict via her husband's involvement, supporting disqualification (¶ 5).

   b. Exhibit B establishes Jared D. Kahn, Jeffrey N. Klein, and Branden M. Vicari as witnesses or victims of VBM fraud, triggering Rule 4-3.7 and Rule 4-1.10 (¶¶ 1-5).

   c. Exhibit C proves the technical impossibility of the VBM requests, evidencing fraud and systemic misconduct (¶¶ 2-4, 8).

d. Exhibit E demonstrates the County Attorneys' bad faith and obstruction, justifying the bar on public funding and referral to the Florida Bar (¶¶ 6, 8).

8. The facts stated herein are true to the best of my knowledge and belief. I have not altered or misrepresented any exhibit, and I obtained them through lawful means as described. The exhibits support the motion's allegations of conflicts of interest, ethical violations, unlawful public expenditures, and a systemic cascade conflict violating due process, as detailed in paragraphs 1-8.

FURTHER AFFIANT SAYETH NAUGHT.

Dated: April 28, 2025

/s/ Christopher Gleason

Christopher Gleason
2098 Seminole Blvd #6212
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com, gleasonforpinellas@gmail.com

STATE OF FLORIDA
COUNTY OF PINELLAS

Sworn to and subscribed before me this 28th day of April, 2025, by Christopher Gleason, who is personally known to me (or who produced identification:

Notary Public, State of Florida
Name: Scott Suprenant
Commission No.: HH506057
My Commission Expires: July 14, 2028
[Notary Seal]

SCOTT SUPRENANT
Notary Public
State of Florida
Comm# HH506057
Expires 7/14/2028

Exhibit E:

County Attorneys' Drafted Order to Seal Exhibits

A copy of the County Attorneys' draft of the sealing order, dated September 20, 2024, requesting to seal all exhibits in Case Nos. 522024CA003995XXCICI, including public election records (Exhibit B). This action violates F.S. § 119.07 by obstructing access to non-exempt records and demonstrates bad faith under F.S. § 111.07, as alleged in ¶¶ 6, 8, reinforcing the need for disqualification and barring public funding.

Gmail

Christopher Gleason <gleasonforpinellas@gmail.com>

Proposed Order - Christopher Gleason v. Julie Marcus, et al. 24-003995-C

Kahn, Jared D <jkahn@pinellas.gov> Fri, Sep 20, 2024 at 8:28 AM
To: Christopher Gleason <gleasonforpinellas@gmail.com>
Cc: "immutabletruth@protonmail.com" <immutabletruth@protonmail.com>, Christopher Gleason <cpgleason72@gmail.com>, "Klein, Jeffrey" <jklein@pinellas.gov>, "Vicari, Kelly L" <kvicari@pinellas.gov>, "Curtis, Michelle M" <mmcurtis@pinellas.gov>, "Noe, Barbara" <barnoe@pinellas.gov>

Mr Gleason,

I will submit the proposed order this morning noting your objection.

Have a blessed day,

Jared Kahn

On Sep 20, 2024, at 7:58 AM, Christopher Gleason <gleasonforpinellas@gmail.com> wrote:

I definitely object, you are asking to seal all exhibits. That was not even discussed or brought before the court. Your motion was to seal Exhibit G.

On Thu, Sep 19, 2024 at 5:19 PM Kahn, Jared D <jkahn@pinellas.gov> wrote:

Mr. Gleason,

Please see proposed order in Christopher Gleason v. Julie Marcus, et al. 24-003995-CI; GRANTING without prejudice DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS and GRANTING without prejudice DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION.

Please let me know if you have any objections or suggested edits. I will plan to upload this order tomorrow 9/20/24 morning around 11AM if I do not hear from you first.

Have a nice evening,

<image0001.png>

Jared D. Kahn

Senior Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, 6th Floor

Clearwater, FL 33756

Phone: (727) 464-3354

Fax: (727) 464-4147

jkahn@pinellas.gov

All government correspondence is subject to the public records law.

image001.png
35K

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON, Candidate for Supervisor of Elections, Pinellas County, Elector, Citizen, and Taxpayer,

Plaintiff,

v.

Case No.: 24-003995-CI
UCN: 522024CA003995XXCICI

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et al.,

Defendants.

_____/

ORDER GRANTING DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND GRANTING DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION

THIS MATTER came before this Court on September 19, 2024, on DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION, having considered the Motions, the case file, the applicable law, and otherwise fully advised in the premises, the Court hereby **ORDERS and ADJUDGES** that DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS is hereby **GRANTED without prejudice** and DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF

RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION is hereby **GRANTED without prejudice.**

The Pinellas County Clerk of the Circuit Court is directed to maintain all exhibits filed by Plaintiff as Protected/Confidential/Sensitive until further order of the court.

Plaintiff has until **September 19th, 2024,** to respond to DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS.

Plaintiff has until **September 23rd, 2024,** to re-file exhibits with Protected/Confidential/Sensitive data redacted or, in the alternative, file a response in opposition to DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTIVE AND JUDICIAL ADMINISTRATION stating the reason Protected/Confidential/Sensitive should not be protected.

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida this ___ day of September 2024. A true and correct copy of the forgoing has been furnished to all parties listed below.

_____

Judge Patricia Muscarella

cc: all parties

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON, Candidate for Supervisor of Elections, Pinellas County, Elector, Citizen, and Taxpayer,

Plaintiff,

v.

Case No.: 24-003995-CI
UCN: 522024CA003995XXCICI

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et al.,

Defendants.

ORDER GRANTING DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND GRANTING DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION

THIS MATTER came before this Court on September 19, 2024, on DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION, having considered the Motions, the case file, the applicable law, and otherwise fully advised in the premises, the Court hereby **ORDERS and ADJUDGES** that DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS is hereby **GRANTED without prejudice** and DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425,

FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION is hereby **GRANTED without prejudice.**

The Pinellas County Clerk of the Circuit Court is directed to maintain all exhibits filed by Plaintiff as Protected/Confidential/Sensitive until further order of the court.

Plaintiff represented to the Court that he would respond in writing with his opposition to Defendant's motions as to Exhibit C by close of business on September 19th, 2024. Although not received until the morning of September 20th, 2024, the Court nonetheless deems Plaintiff's opposition timely. Defendant shall have until **September 27th, 2024** to serve a reply, if any, to Plaintiff's opposition.

Plaintiff has until **September 23rd, 2024,** to re-file the additional exhibits with Protected/Confidential/Sensitive data redacted or, in the alternative, file a response in opposition to DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION stating his basis or claim of exemption for the inapplicability of Protected/Confidential/Sensitive status as to the exhibits in question.

The parties may renew argument on Defendant's Motions and any related filings at the Case Management Conference scheduled in this matter on **October 1, 2024 at 12:00 P.M.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida this ____ day of September 2024. A true and correct copy of the forgoing has been furnished to all parties listed below.

Circuit Judge Patricia A. Muscarella
24-003995-CI 9/20/2024 3:52:08 PM

Judge Patricia Muscarella

Exhibit F:

Florida Bar Member Profiles for Kelly Vicari, Jared Kahn, and Jeffrey Klein

Screenshots from the Florida Bar website (https://www.floridabar.org), captured April 24, 2025, confirming Kelly Vicari (Bar #88704), Jared Kahn (Bar #105276), and Jeffrey Klein (Bar #1025117) as government attorneys at the Pinellas County Attorney's Office (315 Court St, Clearwater, FL). These profiles verify their roles, practice areas (City/County/Local Government Law), and office size (21-50 attorneys), supporting disqualification under Rule 4-1.7, Rule 4-3.7, and imputed disqualification under Rule 4-1.10, as alleged in ¶¶ 4-5, 9, 14.a-c.

MEMBER PROFILE

Kelly Lynn Vicari

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:

88704

Mail Address:

Pinellas County Attorney's Office
315 Court St
Clearwater, FL 33756-5165

Office: **727-464-3354**

Cell: **727-464-3354** - No Text Messages

Email:

kvicari@pinellascounty.org

Personal Bar URL:

https://www.floridabar.org/mybarprofile/88704

vCard:

County:

Pinellas

Circuit:

06

Admitted:

04/14/2011

10-Year Discipline History:

None

Law School:

Florida Coastal School of Law, 2010

Board Certifications:

Area	Year
City, County and Local Government Law	2019

Sections:

City, County & Local Govt Law

Practice Areas:

City/County/Local Government

Civil Litigation

Workers' Compensation/Defense

Federal Courts:

Florida Middle District Bankruptcy Court

U.S. District Court, Middle District of Florida

U.S. District Court, Northern District of Florida

Firm Position:

Government attorney

The Find a Lawyer directory is provided as a public service. The Florida Bar maintains limited basic information about lawyers licensed to practice in the state (e.g., name, address, year of birth, gender, law schools attended, admission year). However, The Florida Bar allows individual attorneys the opportunity to add personal and professional information to the directory. The lawyer is solely responsible for reviewing and updating any additional information in the directory. The lawyer's added information is not reviewed by The Bar for accuracy and The Bar makes no warranty of any kind, express or implied. The Florida Bar, its Board of Governors, employees, and agents are not responsible for the accuracy of that additional information. Publication of lawyers' contact information in this listing does not mean the lawyers have agreed to receive unsolicited communications in any form. Unauthorized use of this data may result in civil or criminal penalties. The Find a Lawyer directory is not a lawyer referral service.

MEMBER PROFILE

Jared Douglas Kahn

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:

105276

Mail Address:

Pinellas County Attorney's Office
315 Court St
Clearwater, FL 33756-5165

Office: 727-464-3354

Email:

jkahn@pinellas.gov

Personal Bar URL:

https://www.floridabar.org/mybarprofile/105276

vCard:

County:

Pinellas

Circuit:

06

Admitted:

09/27/2013

10 Year Discipline History:

None

Law School:

John Marshall Law School

Sections:

City, County & Local Govt Law

Trial Lawyers

Practice Areas:

City/County/Local Government

Civil Trial

Criminal

Trial

Federal Courts:

U.S. Court of Appeals for the Eleventh Circuit

U.S. District Court, Middle District of Florida

U.S. District Court, Northern District of Florida

U.S. District Court, Southern District of Florida

State Courts:

District Of Columbia

Firm:

Pinellas County Attorney's Office

Firm Size:

21-50

Firm Position:

Government attorney

The Find a Lawyer directory is provided as a public service. The Florida Bar maintains limited basic information about lawyers licensed to practice in the state (e.g., name, address, year of birth, gender, law schools attended, admission year). However, The Florida Bar allows individual attorneys the opportunity to add personal and professional information to the directory. The lawyer is solely responsible for reviewing and updating any additional information in the directory. The lawyer's added information is not reviewed by The Bar for accuracy and The Bar makes no warranty of any kind, express or implied. The Florida Bar, its Board of Governors, employees, and agents are not responsible for the accuracy of that additional information. Publication of lawyers' contact information in this listing does not mean the lawyers have agreed to receive unsolicited communications in any form. Unauthorized use of this data may result in civil or criminal penalties. The Find a Lawyer directory is not a lawyer referral service.

MEMBER PROFILE

Jeffrey Nathaniel Klein

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:

1025117

Mail Address:

Pinellas County Attorney's Office
315 Court St Fl 6
Clearwater, FL 33756-5165

Office: 727-464-3354

Email:

jklein@pinellascounty.org

Personal Bar URL:

https://www.floridabar.org/mybarprofile/1025117

vCard:

County:

Pinellas

Circuit:

06

Admitted:

11/23/2020

10-Year Discipline History:

None

Sections:

City, County & Local Govt Law

Young Lawyers

Firm:

Pinellas County Attorney's Office

Firm Position:

Government attorney

The Find a Lawyer directory is provided as a public service. The Florida Bar maintains limited basic information about lawyers licensed to practice in the state (e.g. name, address, year of birth, gender, law schools attended, admission year). However, The Florida Bar allows individual attorneys the opportunity to add personal and professional information to the directory. The lawyer is solely responsible for reviewing and updating any additional information in the directory. The lawyer's added information is not reviewed by The Bar for accuracy and The Bar makes no warranty

Exhibit G:

Affidavit of John Siamus

Affidavit of John Siamus, dated April 24, 2025, attesting to the capture of a screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov) on April 10, 2025, using Zight Screen Capture. The affidavit confirms the screenshot's authenticity, showing a 'Protected' status or error message blocking online VBM requests for protected voters, as mandated by F.S. § 97.0585, supporting fraud allegations and attorney conflicts in ¶¶ 2-4, 9.

AFFIDAVIT OF JOHN SIAMASDETAILING THE EVENTS OF REQUESTING A VOTE-BY-MAIL-BALLOT AS A PROTECTED VOTER

STATE OF FLORIDA)

) ss:

COUNTY OF PINELLAS)

Before me, the undersigned authority, personally appeared JOHN SIAMAS, who, being duly sworn, states as follows:

AFFIANT IDENTITY

1. I, John Siamas, was a Republican candidate for the Florida State Sente District 21 Primary Election held on August 20th, 2024. I am over 18 and competent to make this affidavit and have personal knowledge of the facts stated herein.

PURPOSE OF AFFIDAVIT

2. This affidavit is made to establish the process I underwent requesting a Mail Ballot from the Pinellas County Supervisor of Elections as a "Protected Voter" on April 11, 2025 at 12:17 p.m.

MAIL BALLOT REQUEST FROM THE PINELLAS COUNTY SUPERVISOR OF ELECTIONS OFFICE

3. On April 11, 2025, at 12:17 p.m., I accessed the Pinellas County Supervisor of Elections website (*votepinellas.gov*) to request a mail ballot. I took screenshots of the entire process and have included them as **Exhibit 1**.

4. After entering all the requested information, I received a message which stated "The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

5. I then proceeded to call the Supervisor of Elections in Pinellas County as instructed in the message I received, at 12:20 p.m.

6. I spoke with a Supervisor of Elections Representative who stated that protected voters cannot request their Mail Ballot online. He then stated he could process my Mail Ballor request over the phone and proceeded to request some information in order to process the Mail Ballot request.

7. The information requested included my name, address, date of birth, and the last 4 of my SSN. I was not instructed to fill out any forms or provide any additional details to process the Mail Ballot request. I transcribed the full conversation with the Supervisor of Election Representative I had on April 11, 2025 (see **Exhibit 2**).

4. All of the records attached to this affidavit are true and correct copies of documents created at or near the time of the described events.

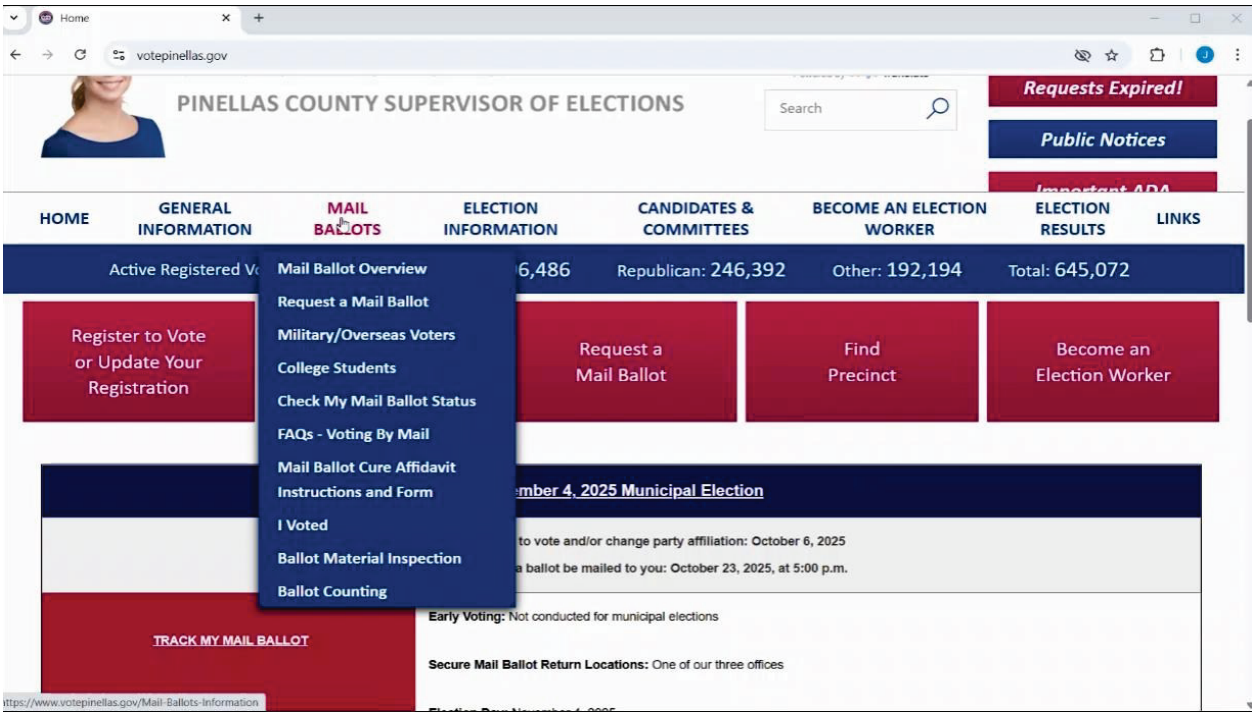
LIST OF EXHIBITS

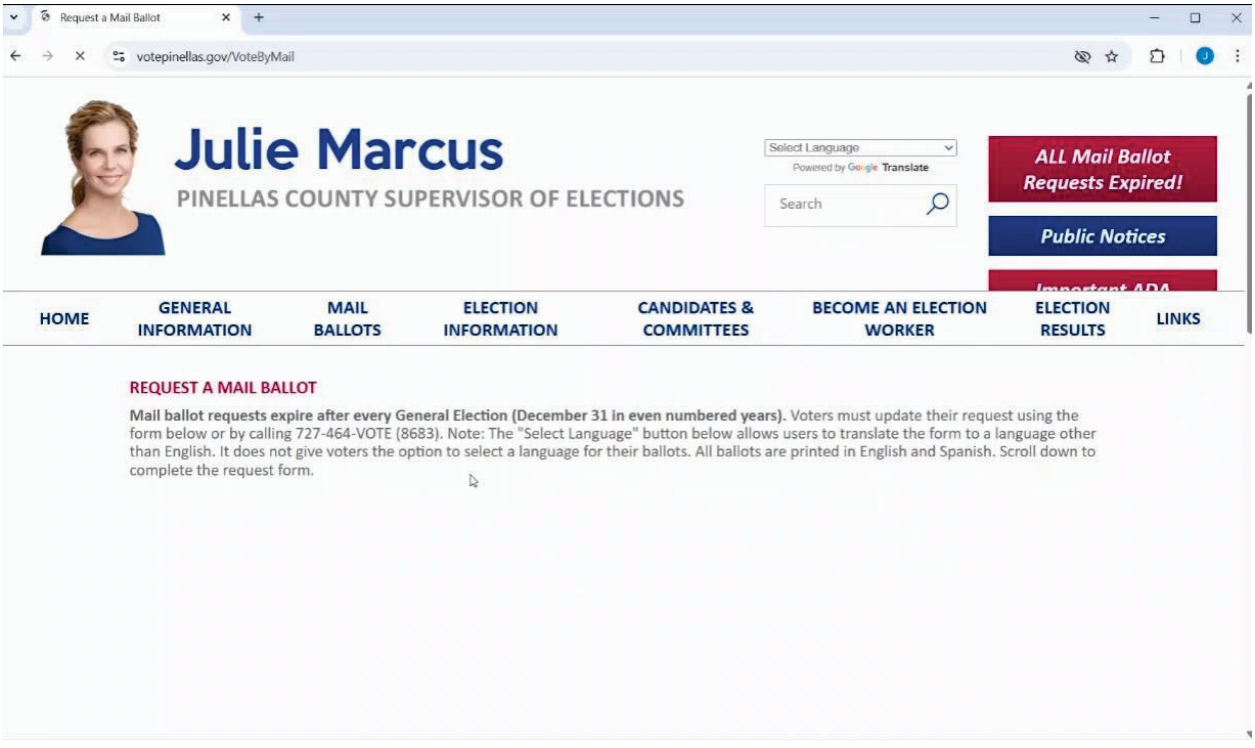
1. **Exhibit 1**: Screenshots of online Mail Ballot Request from the website of the Pinellas County Supervisor of Election website, *votepinellas.gov.*

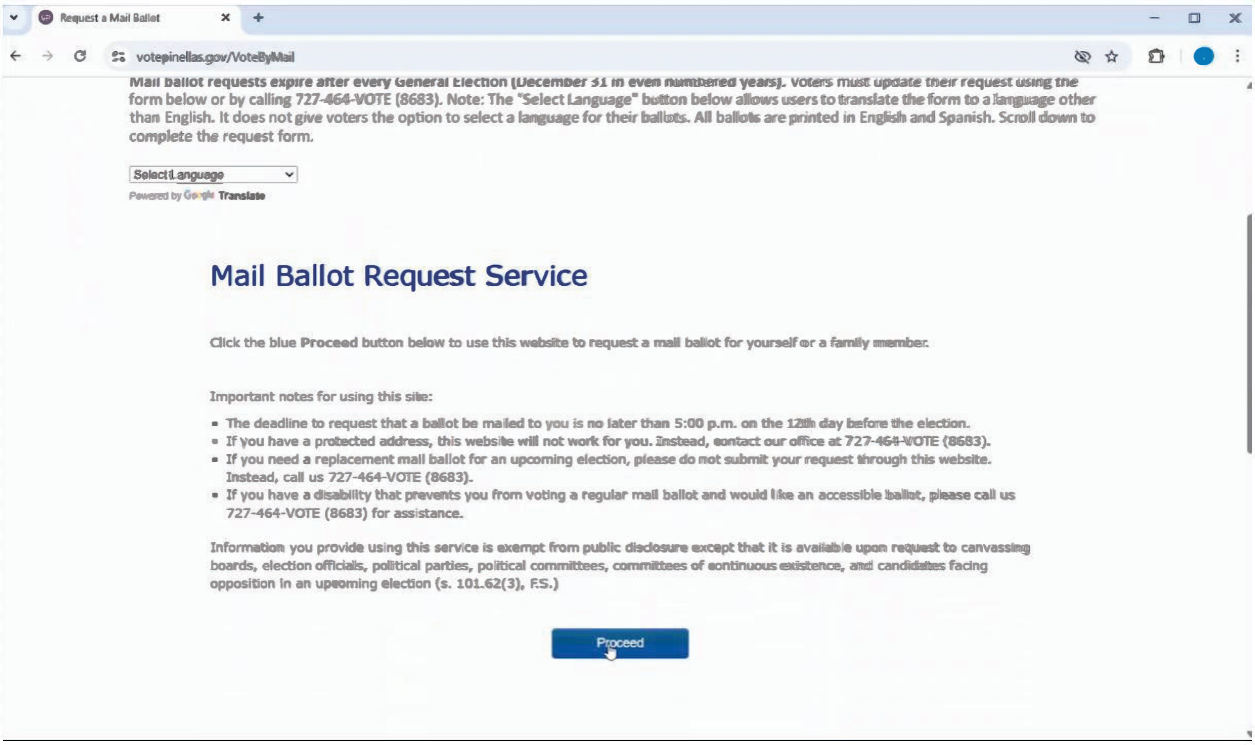
2. **Exhibit 2**: Transcription of Conversation with the Pinellas County Supervisor of Election Representative requesting a Mail Ballot on April 11, 2025, 12:20 p.m.

Exhibit 1

Screenshots of online Mail Ballot Request from the website of the Pinellas County Supervisor of Election website, *votepinellas.gov.*




votepinellas.gov/VoteByMail
Julie Marcus
PINELLAS COUNTY SUPERVISOR OF ELECTIONS
Select Language
Powered by Google Translate
Search
ALL Mail Ballot Requests Expired!
Public Notices
HOME
GENERAL INFORMATION
MAIL BALLOTS
ELECTION INFORMATION
CANDIDATES & COMMITTEES
BECOME AN ELECTION WORKER
ELECTION RESULTS
LINKS
REQUEST A MAIL BALLOT
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.


Request a Mail Ballot
votepinellas.gov/VoteByMail
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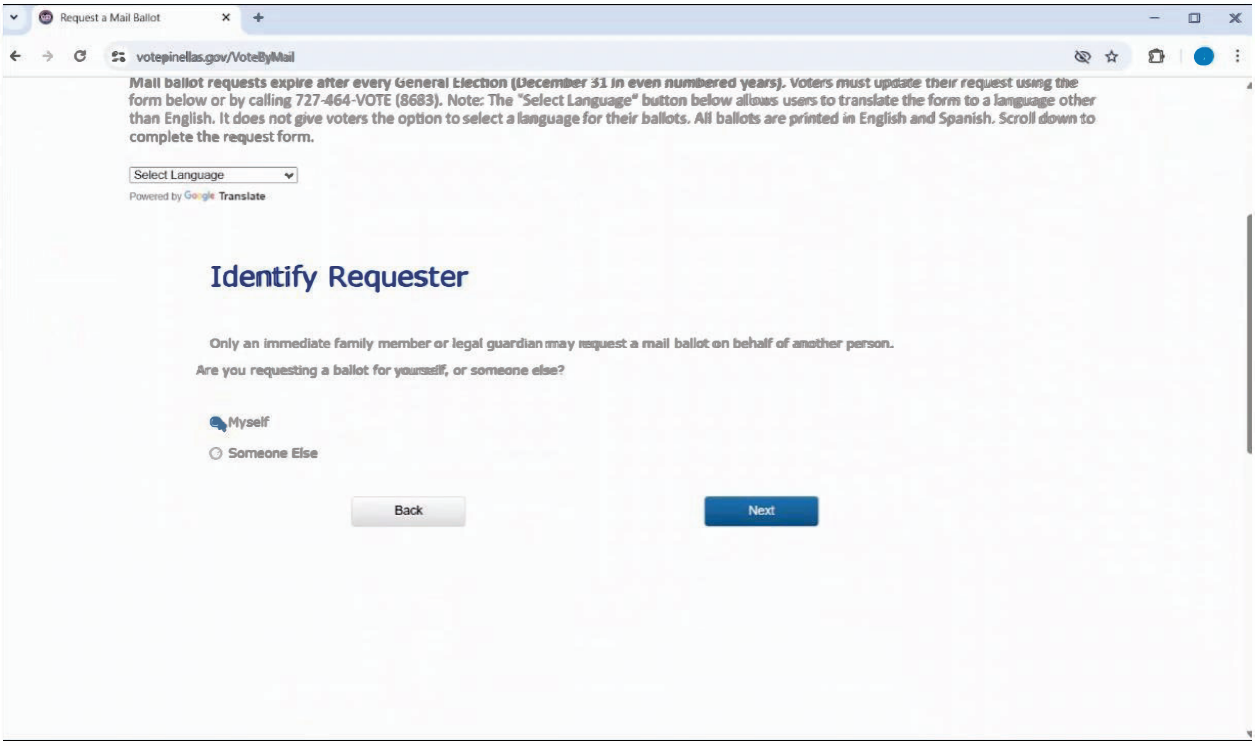
Select Language
Powered by Google Translate
Mail Ballot Request Service
Click the blue Proceed button below to use this website to request a mail ballot for yourself or a family member.
Important notes for using this site:
The deadline to request that a ballot be mailed to you is no later than 5:00 p.m. on the 12th day before the election.
If you have a protected address, this website will not work for you. Instead, contact our office at 727-464-VOTE (8683).
If you need a replacement mail ballot for an upcoming election, please do not submit your request through this website. Instead, call us 727-464-VOTE (8683).
If you have a disability that prevents you from voting a regular mail ballot and would like an accessible ballot, please call us 727-464-VOTE (8683) for assistance.
Information you provide using this service is exempt from public disclosure except that it is available upon request to canvassing boards, election officials, political parties, political committees, committees of continuous existence, and candidates facing opposition in an upcoming election (s. 101.62(3), F.S.)
Proceed


Request a Mail Ballot
votepinellas.gov/VoteByMail
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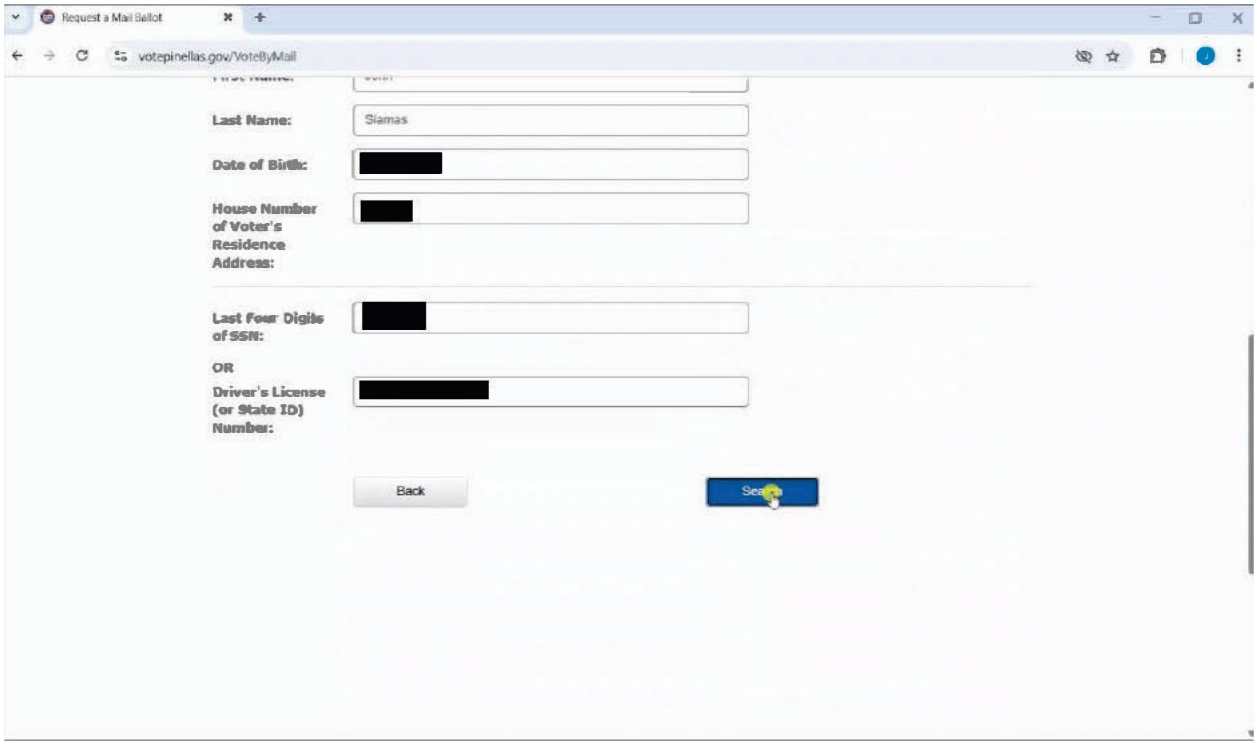
Select Language
Powered by Google Translate
Identify Requester
Only an immediate family member or legal guardian may request a mail ballot on behalf of another person.
Are you requesting a ballot for yourself, or someone else?
Myself
Someone Else
Back
Next


Request a Mail Ballot
votepinellas.gov/VoteByMail
Last Name:
Siamas
Date of Birth:
House Number of Voter's Residence Address:
Last Four Digits of SSN:
OR
Driver's License (or State ID) Number:
Back

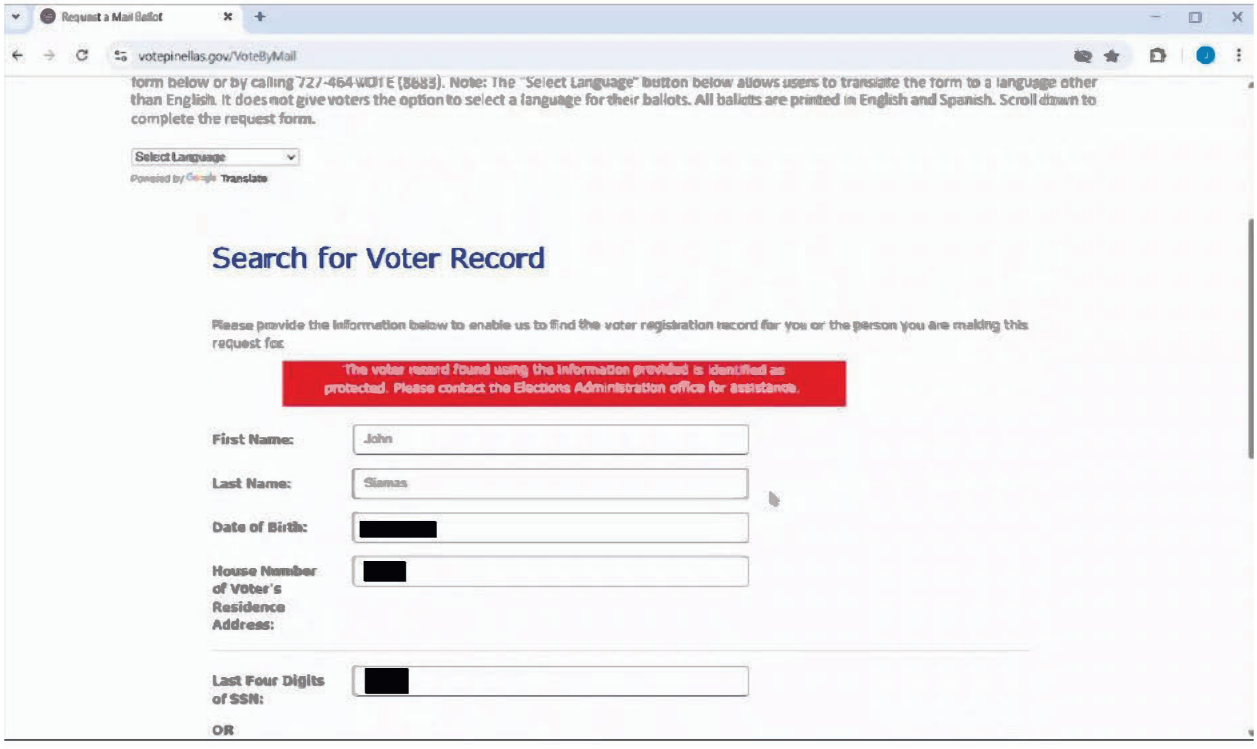

Request a Mail Ballot
votepinellas.gov/VoteByMail
form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Search for Voter Record
Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.
The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.
First Name:
John
Last Name:
Siamas
Date of Birth:
House Number of Voter's Residence Address:
Last Four Digits of SSN:
OR

Exhibit 2

Transcription of Conversation with the Pinellas County Supervisor of Election Representative requesting a Mail Ballot on April 11, 2025, 12:20 p.m.

Siamas: Hi good morning, I just tried to apply for my mail ballot, and I guess, not I guess I'm protected so there was a message that said I need to contact the elections administration office for assistance.

Supervisor of Elections Representative: Yea so if it's protected it's not going to allow, I'll do it over the phone.

Siamas: Oh ok so is that what happens, I can't do it online anymore because it's protected?

Supervisor of Elections Representative: Um yea I mean I've found that, I don't know how long it's been like that but yea you call in cause it's a protected address.

Siamas: Ok I'm just curious because I just recently became, You know I just recently submitted my paperwork to.

Supervisor of Elections Representative: Yea so we can do it over the phone.

Siamas: Ok is that cause it said elections administration office, I got a little confused I didn't know whether that is your office or another office.

Supervisor of Elections Representative: Yea it's the Supervisor of Elections Office.

Siamas: Ok, ok fantastic, yea just let me know what's next, I'm sorry.

Supervisor of Elections Representative: I just need your, just need your last name and your date of birth to get started.

Siamas: Ok so it's S-I-A-M-A-S.

Supervisor of Elections Representative: What's your date of birth?

Siamas: [redacted]

Supervisor of Elections Representative: Ok just give me a second.

Siamas: Actually this might apply to my spouse as well I'm assuming right? Because she, they would be included so, she hasn't tried yet but um, but I guess it would be the same process right?

Supervisor of Elections Representative: Um yes it's protected. Last four of

your social to verify the record please.

Siamas: Sure [redacted]

Supervisor of Elections Representative: Ok, and verify your address please.

Siamas: Yea its [redacted]

[redacted] Let me get my, do you need my driver's license?

Supervisor of Elections Representative: Uh, no Sir.

Siamas: Ok

Supervisor of Elections Representative: Give me a second here while I verify your record.

Siamas: Do you know why that is when you are protected, uh you gotta go through this process?

Supervisor of Elections Representative: I don't know why, I do know if somebody didn't have, you have one or the other you have your DL or the last four of your Social and you enter one or the other.

Siamas: Oh, I entered both is that why its coming up.

Supervisor of Elections Representative: No

Siamas: Oh ok ok, I thought I maybe screwed up when I was entering the data.

Supervisor of Elections Representative: Alright so, so your record is updated and it's good until December 31, 2026, so it's all this year and next year, um you are in a county not in a municipality so.

Siamas: Correct.

Supervisor of Elections Representative: So you have nothing scheduled for this year unless we have a special election then you will receive a mail ballot, other than that next year.

Siamas: Ok so I'm good to go when, um.

Supervisor of Elections Representative: You are good to go all the way to next year.

Siamas: So I'll get it in the mail right, I don't have to worry about that or

anything?

Supervisor of Elections Representative: Right, right you'll get it, if for some reason you don't, you can always call or go online to see the status of it.

Siamas: Oh, can I check the status?

Supervisor of Elections Representative: I don't know if you are protected, I don't have that answer.

Siamas: Ok got it, well I'll give it a shot after a couple days, after it gets into the system I guess, I didn't even know you can do that.

Supervisor of Elections Representative: Yea you can check your status, and if you pull that up during an election you can pull that up and it will tell you where your ballot is, when its been mailed, if its been counted, you know that whole process.

Siamas: Gotcha, ok yea I haven't even been in this ballot status thing, I didn't even know it exists to be honest with you, yea I don't expect it to be updated right away so um, I'll um, I'll take a look in.. This is interesting, not that I'm questioning it, I'm just, its interesting how it um, and it's good, I'm very happy that the protected has to go through a um different process.

Supervisor of Elections Representative: My guess is you can't pull up your information since it is protected, also if there is a record request it is protected so a third party could not get that information cause it is protected so that's the whole thing.

Siamas: ok, um fantastic, well thank you so much for your help I um really appreciate it

Supervisor of Elections Representative: Alright have a good

Siamas: Thank you bye bye.

[AFFIANT SIGNATURE]

Sworn to and subscribed before me by means of ✓ physical presence or _____ online notarization, this 28th day of April 2025, by JOHN SIAMAS.

Notary Public – State of Florida

Eliana Pimentel

ELIANA PIMENTEL
Notary Public - State of Florida
Commission # HH 496125
My Comm. Expires May 9, 2028

Personally Known _____ OR Produced Identification ✓

Type of Identification Produced: Drivers License

Tab X – Attorney General Opinions: Opinions barring taxpayer-funded defenses for misconduct or election contests.

OFFICE OF ATTORNEY GENERAL
JAMES UTHMEIER
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FILE COMPLAINT

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ELECTIONS, CONTESTED ELECTIONS , LEGAL COSTS

Number: AGO 77-87

Issued August 22, 1977

Subject: Elections, contested elections , legal costs

ELECTIONS--SUCCESSFUL CANDIDATE MAY NOT USE PUBLIC FUNDS TO DEFEND CONTESTED ELECTION RESULT

To: Willie Mae Jones, Gilchrist County Supervisor of Elections, Trenton

Prepared by: Patricia R. Gleason, Assistant Attorney General

QUESTION:

May county funds or funds available in the office budget of the supervisor of elections be expended to provide a defense for a supervisor of elections who has been made a party defendant in an election contest in his or her individual capacity as the successful candidate or nominee and where the county canvassing board of which such supervisor is a member is a party defendant as required by s. 102.161, F. S.?

SUMMARY:

Neither county funds nor funds available in the office budget of the supervisor of elections may be expended to defend a supervisor of elections who has been made a party defendant as the successful candidate or nominee in an election contest instituted pursuant to s. 102.161, F. S. Such litigation is personal to the candidates involved and, therefore, the county has no interest in expending funds to defend the supervisor in such proceedings.

According to your letter, you were made a party defendant in an election contest proceeding instituted pursuant to s.

102.161, F. S. That section provides in pertinent part:

"The certification of election or nomination of any person to office may be contested in the circuit court . . . by any unsuccessful candidate for such office . . .. *The successful candidate and the canvassing board or election board shall be the proper party defendants*." (Emphasis supplied.)

An examination of the complaint filed by the unsuccessful candidate for nomination to the office of supervisor of elections, a copy of which you have attached to your letter, reveals that you were made a party defendant in your individual capacity as the successful candidate for nomination to the office of supervisor of elections and that the county canvassing board was also made a party defendant as required by the terms of s. 102.161, F. S., above quoted. The complaint further reveals that no charges are made against or relief sought from the defendant canvassing board with respect to any act on the part of such board in carrying out its statutorily assigned duties and functions. (*See* ss. 101.68, 102.141, 102.151, and 102.166, F. S., as to the duties and functions of the county canvassing board.) To the contrary, the complaint alleges that the supervisor of elections unlawfully solicited the casting of absentee ballots. Thus, the complaint prays that "the returns from the absentee ballots in said election be rejected" and that the unsuccessful candidate be "declared the rightful winner of said election."

The foregoing analysis of the allegations contained in the complaint makes clear that the action is simply an election contest predicated upon the validity of certain absentee votes and challenging the right of the successful candidate or nominee to hold the office to which she was elected. The question of whether or not public funds may properly be expended to provide a legal defense for the successful candidate in such an election contest proceeding has been recently considered by the court in Markham v. State By and Through the Department of Revenue, 298 So.2d 210 (1 D.C.A. Fla., 1974). The *Markham* case involved an election contest challenging the action of the Broward County Canvassing Board in canvassing and counting certain absentee ballots. The unsuccessful candidate for the office of Broward County Tax Assessor sued both the successful candidate in his individual capacity and the county canvassing board. The question under consideration by the court was whether or not the successful candidate for the office of tax assessor could use funds available in his office budget for legal expenses to pay attorneys he had retained to defend him in the election contest. In ruling that such an expenditure would be improper, the court held:

"The suit giving rise to the incurring of the attorney's fees was not against the [tax assessor] in his official capacity nor did it arise from a discharge of his official duties nor serve a public purpose. The suit was a pure and simple election contest relating to the validity of certain absentee votes. The questioned absentee votes were sufficient in number to affect the result of the election. Under the law of Florida as announced in cases too numerous to cite, had the contestant been successful in his attack upon the votes the appellant would have ceased to be tax assessor and his opponent would have taken office. The office, functions and duties of tax assessor would not have been in any manner altered. There would simply have been another man filling the position. The legal battle between the political contestants was purely personal. Each wanted to be tax assessor of Broward County and the challenged absentee votes furnished the key to the door." [298 So.2d at 212.]

Accord: Peck v. Spencer, 7 So. 642, 644 (Fla. 1890) (town council was without authority to authorize the acting mayor to defend at the town's expense a suit which had been filed against the acting mayor by a defeated candidate to test the validity of the town election); Williams v. City of Miami, 42 So.2d 582 (Fla. 1949) (city had no interest in defending a suit arising out of a recall election); AGO's 071-185 and 071-276.

Applying the foregoing cases and Attorney General Opinions to your inquiry, it is my opinion that the expenditure of public funds, either from your office income or budgeted funds or county funds, to defend you in your capacity as the succ

candidate or nominee in an election contest proceeding brought pursuant to s. 102.161, F. S., would be improper. To the extent that the lawsuit represents a "legal battle" between an unsuccessful and a successful candidate or nominee to determine who is entitled to the office of supervisor of elections, it would appear that the outcome of such litigation is dependent upon the validity of the absentee ballots cast and is, therefore, personal to the candidates involved. Furthermore, no additional factors which would indicate sufficient public interest in the outcome of the election contest are made apparent from the face of the complaint. *Compare* Estes v. City of North Miami Beach, 227 So.2d 33, 34 (Fla. 1969), wherein the Supreme Court found that it was not an abuse of discretion for the city council to engage special counsel to defend a law suit filed against four of the seven members of the city council and the city attorney by a defeated candidate for city councilman. The court held that the challenged appropriation of municipal funds to pay such special counsel must be considered in light of the following facts: a *majority* of the city council were defendants in the law suit; the plaintiff sought a judicial construction of the provisions of the municipal election code and an injunction against the defendants restraining them from performing all their official duties on behalf of the municipality other than legislative action. *See also* Miller v. Carbonelli, 80 So.2d 909 (Fla. 1955), holding that the town council was authorized to engage an attorney to defend the mayor in a quo warranto proceeding brought by one councilman against the new mayor elected by the council from their own number challenging both the right of the newly elected mayor to assume office and the action of the council electing him where "the issue not only immediately and directly affected the proper governance and administration of village affairs but the official action of the councilmen as electors was challenged."

The fact that the supervisor of elections is a member of the county canvassing board does not alter the conclusion set forth above. Section 102.161, *supra*, requires that the canvassing board be made a party defendant, *as an entity*, to an election contest proceeding brought pursuant to that section. The members of such canvassing board, therefore, are only nominal defendants who are required to be joined by statute. [It should be noted that the Legislature has recently amended s. 102.141, F. S., to provide for the replacement of a member of the county canvassing board if such member is unable to serve or "is a candidate who has opposition in the election being canvassed or is an active participant in the campaign or candidacy of any candidate who has opposition in the election being canvassed . . .." Section 26 of Ch. 77-175, Laws of Florida, effective January 1, 1978. With specific regard to the supervisor of elections, s. 26 of Ch. 77-175 provides that if the supervisor of elections is unable to serve or is disqualified pursuant to the section, then the chairman of the board of county commissioners shall appoint a member of the board of county commissioners who is not a candidate with opposition in the election being canvassed; however, the supervisor is required to act in an advisory capacity to the canvassing board.] *Cf.* State *ex rel.* Hutchins v. Taylor, 143 So. 754, 757 (Fla. 1932), holding that, in the absence of statutory authorization, a county judge cannot be replaced as a member of the canvassing board because he is a candidate in the election canvassed. The duties imposed upon the county canvassing board "to canvass the returns of a[n] . . . election are *ministerial* in their nature, involving no discretion." (Emphasis supplied.) State *ex rel.* Knott v. Haskill, 72 So. 651 (Fla. 1916); *See also* State *ex rel.* Peacock v. Latham, 170 So. 472 (Fla. 1936). Accordingly, a county canvassing board possesses no authority to pass upon the regularity of an election or the qualifications of persons thereat. State v. McLin, 16 Fla. 17 (1876). County canvassers have no power to go beyond the inspectors' returns except to determine their genuineness, nor may the canvassing board reject returns which are genuine on their face. State *ex rel.* Bisbee v. Board of Canvassers of Alachua County, 17 Fla. 9 (1878). Applying these principles to your inquiry, it is clear that the canvassing board is not authorized to determine whether or not the supervisor of elections unlawfully solicited absentee ballots; such a determination can only be made by the judiciary by means of the election contest. Thus, while the county is authorized to defend the *canvassing board* as an *entity* in an election contest (*see* AGO 068-70), neither county funds nor funds budgeted in the office account of the supervisor of elections may be used to defend the *supervisor of elections* who was the successful candidate or nominee in an election contest predicated on the validity of absentee ballots, which absentee ballots were alleged to have been unlawfully solicited by the supervisor of elections.

Your question is accordingly answered in the negative.

Resources

AG Opinions

Annual Regulatory Plan

Consumer Protection

Doing Business with the Office

FAQ

Florida Digital Bill of Rights Annual Enforcement Report

Opioid Settlements

Statement of Agency Organization and Operation

Employment

File a Complaint

Human Trafficking Summit

Victim Services

Dozier Claims

Nicotine Dispensing Device Directory

Attorney General's Policy Memorandum Regarding Outside Counsel for the State of Florida

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Military and Veterans Assistance Program

Open Government

Dose of Reality Florida

Request for Proposal for Professional Legal Services – Roku

Crime Prevention Summit

Office of the Attorney General
State of Florida
PL-01, The Capitol
Tallahassee, FL 32399-1050

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ELECTIONS, CONTESTED ELECTIONS , LEGAL COSTS

Number: AGO 77-87

Issued August 22, 1977

Subject: Elections, contested elections , legal costs

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Prepared by: Patricia R. Gleason, Assistant Attorney General

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Accord: Peck v. Spencer, 7 So. 642, 644 (Fla. 1890) (town council was without authority to authorize the acting mayor to defend at the town's expense a suit which had been filed against the acting mayor by a defeated candidate to test the validity of the town election); Williams v. City of Miami, 42 So.2d 582 (Fla. 1949) (city had no interest in defending a suit arising out of a recall election); AGO's 071-185 and 071-276.

Applying the foregoing cases and Attorney General Opinions to your inquiry, it is my opinion that the expenditure of public funds, either from your office income or budgeted funds or county funds, to defend you in your capacity as the succ

candidate or nominee in an election contest proceeding brought pursuant to s. 102.161, F. S., would be improper. To the extent that the lawsuit represents a "legal battle" between an unsuccessful and a successful candidate or nominee to determine who is entitled to the office of supervisor of elections, it would appear that the outcome of such litigation is dependent upon the validity of the absentee ballots cast and is, therefore, personal to the candidates involved. Furthermore, no additional factors which would indicate sufficient public interest in the outcome of the election contest are made apparent from the face of the complaint. *Compare* Estes v. City of North Miami Beach, 227 So.2d 33, 34 (Fla. 1969), wherein the Supreme Court found that it was not an abuse of discretion for the city council to engage special counsel to defend a law suit filed against four of the seven members of the city council and the city attorney by a defeated candidate for city councilman. The court held that the challenged appropriation of municipal funds to pay such special counsel must be considered in light of the following facts: a *majority* of the city council were defendants in the law suit; the plaintiff sought a judicial construction of the provisions of the municipal election code and an injunction against the defendants restraining them from performing all their official duties on behalf of the municipality other than legislative action. *See also* Miller v. Carbonelli, 80 So.2d 909 (Fla. 1955), holding that the town council was authorized to engage an attorney to defend the mayor in a quo warranto proceeding brought by one councilman against the new mayor elected by the council from their own number challenging both the right of the newly elected mayor to assume office and the action of the council electing him where "the issue not only immediately and directly affected the proper governance and administration of village affairs but the official action of the councilmen as electors was challenged."

The fact that the supervisor of elections is a member of the county canvassing board does not alter the conclusion set forth above. Section 102.161, *supra*, requires that the canvassing board be made a party defendant, *as an entity*, to an election contest proceeding brought pursuant to that section. The members of such canvassing board, therefore, are only nominal defendants who are required to be joined by statute. [It should be noted that the Legislature has recently amended s. 102.141, F. S., to provide for the replacement of a member of the county canvassing board if such member is unable to serve or "is a candidate who has opposition in the election being canvassed or is an active participant in the campaign or candidacy of any candidate who has opposition in the election being canvassed . . .." Section 26 of Ch. 77-175, Laws of Florida, effective January 1, 1978. With specific regard to the supervisor of elections, s. 26 of Ch. 77-175 provides that if the supervisor of elections is unable to serve or is disqualified pursuant to the section, then the chairman of the board of county commissioners shall appoint a member of the board of county commissioners who is not a candidate with opposition in the election being canvassed; however, the supervisor is required to act in an advisory capacity to the canvassing board.] *Cf.* State *ex rel.* Hutchins v. Taylor, 143 So. 754, 757 (Fla. 1932), holding that, in the absence of statutory authorization, a county judge cannot be replaced as a member of the canvassing board because he is a candidate in the election canvassed. The duties imposed upon the county canvassing board "to canvass the returns of a[n] . . . election are *ministerial* in their nature, involving no discretion." (Emphasis supplied.) State *ex rel.* Knott v. Haskill, 72 So. 651 (Fla. 1916); *See also* State *ex rel.* Peacock v. Latham, 170 So. 472 (Fla. 1936). Accordingly, a county canvassing board possesses no authority to pass upon the regularity of an election or the qualifications of persons thereat. State v. McLin, 16 Fla. 17 (1876). County canvassers have no power to go beyond the inspectors' returns except to determine their genuineness, nor may the canvassing board reject returns which are genuine on their face. State *ex rel.* Bisbee v. Board of Canvassers of Alachua County, 17 Fla. 9 (1878). Applying these principles to your inquiry, it is clear that the canvassing board is not authorized to determine whether or not the supervisor of elections unlawfully solicited absentee ballots; such a determination can only be made by the judiciary by means of the election contest. Thus, while the county is authorized to defend the *canvassing board* as an *entity* in an election contest (*see* AGO 068-70), neither county funds nor funds budgeted in the office account of the supervisor of elections may be used to defend the *supervisor of elections* who was the successful candidate or nominee in an election contest predicated on the validity of absentee ballots, which absentee ballots were alleged to have been unlawfully solicited by the supervisor of elections.

Your question is accordingly answered in the negative.

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COUNTY FUNDS, ELECTION CONTEST SUIT

Number: AGO 2001-53

Issued July 18, 2001

Subject: County funds, election contest suit

The Honorable Ed Dean
Sheriff, Marion County
Post Office Box 1987
Ocala, Florida 34478

RE: ELECTIONS--CONTESTS OF ELECTIONS--ATTORNEY'S FEES--PUBLIC FUNDS--CANDIDATES--county funds may not be used for defense of successful candidate in an election contest suit. s. 102.168, Fla. Stat.

Dear Sheriff Dean:

You ask substantially the following question:

May county funds be used to pay the legal fees of a successful political candidate who is an indispensable party to a suit contesting the results of an election, when the canvassing board has been charged with failure to carry out its statutory duties?

In sum:

County funds may not be used to pay the legal fees of a successful candidate in a contested election, regardless of whether the candidate is an indispensable party to the suit and whether charges have been made against the canvassing b

Section 102.168(1), Florida Statutes, provides that:

"Except as provided in s. 102.171, the certification of election or nomination of any person to office, or of the result on any question submitted by referendum, may be contested in the circuit court by any unsuccessful candidate for such office or nomination thereto or by any elector qualified to vote in the election related to such candidacy, or by any taxpayer, respectively."[1]

The statute sets forth the grounds for contesting an election as follows:

"(a) Misconduct, fraud, or corruption on the part of any election official of any member of the canvassing board sufficient to change or place in doubt the result of the election.
(b) Ineligibility of the successful candidate for the nomination or office in dispute.
(c) Receipt of a number of illegal votes or rejection of a number of legal votes sufficient to change or place in doubt the result of the election.
(d) Proof that any elector, election official, or canvassing board member was given or offered a bribe or reward in money, property, or any other thing of value for the purpose of procuring the successful candidate's nomination or election or determining the result on any question submitted by referendum.
(e) Any other cause or allegation which, if sustained, would show that a person other than the successful candidate was the person duly nominated or elected to the office in question or that the outcome of the election on a question submitted by referendum was contrary to the result declared by the canvassing board or election board."[2]

The canvassing board or election board is designated as a proper party defendant, while the successful candidate is made an indispensable party to any action contesting an election or nomination of a candidate.[3]

A suit, naming you as a defendant, has been filed contesting the November 2000 election for Marion County Sheriff. Grounds for the suit are cited as misconduct on the part of election officials, receipt of illegal votes or rejection of legal votes, vote tabulation errors, and the canvassing board's failure to properly report to the Division of Elections the tabulation errors and corrective actions taken. You question whether the fact that none of the grounds for the contest relates to actions by you would lead to a different conclusion than that reached in Attorney General Opinion 77-87.

In Attorney General Opinion 77-87, this office was asked whether the successful candidate for the office of supervisor of elections could use county funds or funds in the budget of that office to defend an election contest suit in the supervisor's individual capacity. In that opinion, the supervisor had been charged with unlawfully soliciting absentee ballots. No charges had been made alleging improper actions by the county canvassing board. The opinion primarily relies upon *Markham v. State, Department of Revenue*[4] to assess the situation. In *Markham,* the unsuccessful candidate for tax assessor had sued the successful candidate in his individual capacity, as well as the county canvassing board. The question before the court was whether the successful candidate could use office funds to pay for his defense. The successful candidate claimed that since the election contest only involved the propriety of the canvassing board counting certain questioned absentee votes, without any allegations of personal wrongdoing, the suit was public rather than personal. The court rejected this argument and found that the public's interest in an election contest suit is that the properly elected candidate hold office, not that any particular person hold the office. Concluding that the use of public funds for the successful candidate's defense would be improper, the court found that the suit in no way involved the official duties of the office, but was a "pure and simple" election contest relating to the validity of certain absentee votes.

Applying the rationale in *Markham* and similar cases, this office concluded that the expenditure of public funds by the successful candidate in defending an election contest would be improper.

While the question of public funds being used to pay attorney's fees for defending an election contest suit has not been directly addressed subsequently, several cases have mentioned *Markham* with approval.[5] In *Thornber v. City of Fort Walton Beach,*[6] the Supreme Court of Florida reiterated the established proposition that in order for a public official to be entitled to representation at public expense, the litigation must arise out of or be in connection with the performance of official duties, and it must serve a public purpose.[7] This standard remains the appropriate measure to determine whether public funds may be expended for legal representation. It should also be noted that no statutory changes have occurred that would affect the conclusions of the *Markham* court or this office.[8]

In this instance, the election contest action did not arise out of or in connection with the performance of your official duties as sheriff. Moreover, while it could be argued that the public has an interest in having a sheriff in office to ensure the uninterrupted function of that office, it could be asserted that more importantly the public possesses the right to have the sheriff who was properly elected in office.

Accordingly, it is my opinion that county funds may not be used to pay for the defense of a successful candidate in an election contest suit, regardless of whether the charges arise from alleged improprieties by the county canvassing board or by the successful candidate.

Sincerely,

Robert A. Butterworth
Attorney General

RAB/tls

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[1] Section 102.171, Fla. Stat., prescribes the jurisdiction and procedures for contesting an election to the Legislature, making the house to which the candidate has been elected "the sole judge of the qualifications, elections, and returns of its members."

[2] Section 102.168(3), Fla. Stat.

[3] Section 102.168(4), Fla. Stat.

[4] 298 So. 2d 210 (Fla. 1st DCA 1974).

[5] *See Lomelo v. City of Sunrise,* 423 So. 2d 974, 976 (Fla. 4th DCA 1982) (public funds may not be expended for other than public purposes; public officers are entitled to a defense at the expense of the public in a law suit arising from the performance of the officer's official duties and while serving a public purpose); *Nuzum v. Valdes,* 407 So. 2d 277, 279 (Fla. 3d DCA 1981) (when a public officer is charged with misconduct while performing his official duties and while serving a public purpose, public has a primary interest in the controversy and should pay the reasonable and necessary legal fees incurred by the public officer in successfully defending against unfounded allegations of official misconduct).

[6] 568 So. 2d 914 (Fla. 1990).

[7] In *Thornber,* council members defended against a recall petition arising from alleged malfeasance of meeting in violation of the sunshine law and subsequently voting at a public meeting to effectively dismiss the city manager and police chief. The Court found that both prongs of the test were satisfied: the vote at a public meeting was within their official duties and their defense served a public purpose in protecting its officers from untimely and illegal recall petitions and ensuring the effective and efficient functioning of its governing body.

[8] You note that s. 102.168, Fla. Stat., makes the successful candidate an indispensable party to an election contest suit, whereas it previously, as s. 102.161, Fla. Stat. (cited in Op. Att'y Gen. Fla. 77-87 [1977]), made the successful candidate and the canvassing or election board "proper party defendants." I would note that this amendment was made by s. 28, Ch. 77-175, Laws of Florida, during the 1977 legislative session, and no subsequent interpretations of the statute would alter the conclusion reached in *Markham* or this office's opinion.

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LEGAL FEES FOR ELECTION CONTEST

Number: INFORMAL

Issued August 14, 2008

Mr. Luis R. Figueredo
Attorney for the City of South Miami
18001 Old Cutler Road, Suite 556
Miami, Florida 33157

Dear Mr. Figueredo:

You have asked whether the City of South Miami may pay the legal fees of an elected city commissioner who was named as an indispensable party pursuant to section 102.168(4), Florida Statutes, in a suit contesting the election.

Section 102.168 (1), Florida Statutes, states that the certification of any election, the nomination of any person to office, or the result of any question submitted by referendum may be contested in the circuit court by any unsuccessful candidate for the office or by any elector qualified to vote in the election related to the candidacy, or by any taxpayer. The successful candidate is an indispensable party to any action contesting the election or nomination of a candidate. [1]

In Attorney General Opinion 2001-53, this office was asked whether county funds could be used to pay the legal fees of a successful political candidate who was an indispensable party to a suit contesting the results of an election, when the canvassing board had been charged with failure to carry out its statutory duties. Citing to a previous opinion of this office, Attorney General Opinion 77-87, and several cases[2] addressing the expenditure of public funds for the defense of an officer, it was concluded that funds may not be used to pay for the defense of a successful candidate in an election contest suit, regardless of whether the charges arise from alleged improprieties by the county canvassing

board or by the successful candidate.

There have been no subsequent amendments to section 102.168, Florida Statutes, or judicial determinations that would alter the conclusions reached in Attorney General 2001-53. Accordingly, it would appear that the City of South Miami may not expend public funds for the defense of the successful candidate for the city commission who is an indispensable party to a suit contesting the results of the election.

I trust that these informal comments will be of assistance to you in resolving this matter.

Sincerely,

Lagran Saunders
Assistant Attorney General

ALS/tsh

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[1] Section 102.168(4), Fla. Stat.

[2] *See Markham v. State, Department of Revenue*, 298 So. 2d 210 (Fla. 1st DCA 1974); *Thornber v. City of Fort Walton Beach*, 568 So. 2d 914 (Fla. 1990); *Lomelo v. City of Sunrise*, 423 So. 2d 974, 976 (Fla. 4th DCA 1982) (public funds may not be expended for other than public purposes; public officers are entitled to a defense at the expense of the public in a law suit arising from the performance of the officer's official duties and while serving a public purpose); *Nuzum v. Valdes*, 407 So. 2d 277, 279 (Fla. 3rd DCA 1981) (when a public officer is charged with misconduct while performing his official duties and while serving a public purpose, public has a primary interest in the controversy and should pay the reasonable and necessary legal fees incurred by the public officer in successfully defending against unfounded allegations of official misconduct); *Maloy v. Board of County Commissioners of Leon County*, 946 So. 2d 1260 (Fla. 1st DCA 2007).

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COSTS OF DEFENDING CRIMINAL CHARGES AND OFFICIALS

Number: AGO 74-124

Issued April 17, 1974

Subject: Costs of defending criminal charges and officials

RE: COUNTIES--COSTS OF DEFENDING CRIMINAL CHARGES AGAINST COUNTY OFFICERS

To: Ralph B. Wilson, St. Lucie County Attorney, Fort Pierce

Prepared by: Rebecca Bowles Hawkins, Assistant Attorney General

QUESTION:

Can the board of county commissioners, in its discretion, pay, from public funds, attorneys' fees and costs of suit incurred by deputy sheriffs acting as jailers for St. Lucie County when prosecuted by the Justice Department of the United States in a federal district court for violating the civil rights of jail inmates by placing them in jail facilities furnished by St. Lucie County, which they were ordered to so use by the sheriff of St. Lucie County, and when the trial jury found each of them "not guilty" of every charge in every count of the indictment?

SUMMARY:

In the absence of statutory authority, county funds may not be used to reimburse jailers for the expense of defending themselves against a federal grand jury indictment seeking to hold them criminally liable for violating the civil rights of jail inmates.

It has been uniformly ruled by this office that public funds may not be used to reimburse a public official for the expense of

defending himself against a criminal charge. In AGO 071-253 I discussed this question in considerable detail and concluded that, in the absence of a statute expressly so providing, public funds may not be used to reimburse a public official for the expense of defending a criminal charge arising out of his official actions, even though he was found not guilty of such charge. It was pointed out therein that, ordinarily, a public official who defends himself on a charge of crime benefits nobody but himself, and any expenditure for this purpose is "for the purely personal and private purpose of keeping himself out of jail," quoting Schieffelin v. Henry 206 N.Y.S. 1972, (1924). *Accord*: Attorney General Opinion 069-40, reaffirming the principle that county funds may be used only for the purpose of accomplishing county purposes and meeting obligations incurred in carrying out county purposes, and noting that "the right of an officer to compensation, for expenses incurred by him in the performance of his official duty, must be found in a provision of the constitution or a statute conferring it either directly or by necessary implication. . . ," quoting 67 C.J.S. s. 91, p. 329. (*See also* Art. II, s. 5, State Const., providing that the duties and compensation of state and county officers must be fixed by law.) It was observed also that statutes authorizing reimbursement for such an expense usually operate prospectively only, the effect of the statute being that "the conditional promise to reimburse contained therein is regarded as a part of the compensation which the state, city, or town . . . stipulates that an officer is to receive in return for services to be rendered," quoting *Schieffelin v. Henry, supra*.

The fact that the employees in question were carrying out the orders of their superior officer, the sheriff, in operating allegedly inferior jail facilities does not make the defense of the criminal action brought against them a "county purpose." The defense of a criminal charge against the sheriff, or the county commissioners, arising out of such an operation, would not have been for a county purpose under the rulings referred to above. A fortiori, the defense of the employees cannot be so characterized.

It is noteworthy that the legislature has expressly provided for the payment of the defense of any warden, sheriff, or deputy sheriff employed by a county "in any *civil* suit arising out of the performance of his duties" (Emphasis supplied.) and for the indemnification of any such person in the event judgment is rendered against him. Section 111.06, F. S. *See also* s. 111.07, F. S., authorizing the use of public funds to defend officers and employees of state agencies and of political subdivisions of the state in *tort* actions based on the negligence of such officers and employees arising out of and in the scope of their employment, "unless such officer or employee acted in bad faith, with malicious purpose, or in a manner exhibiting wanton and willful disregard of human rights, safety, or property."

Several legislative sessions have come and gone since the opinion of my predecessor in office in AGO 069-49, *supra*, was adopted, and two sessions have been held since the ruling in AGO 071-253 was made. However, no statute authorizing the use of public funds in defending officers and employees against criminal charges arising out of the performance of their public duties has been adopted; and, in accordance with the rule ordinarily followed by this office in similar circumstances, a departure from the official rulings previously made would be unwarranted and unjustified.

This is especially true in light of the fact that the propriety of the general rule followed in those opinions appears to have been judicially affirmed by the Second District Court of Appeal in a case involving a former member of the Citrus Commission who was indicted by a grand jury for conspiracy, forgery, and grand larceny allegedly committed by him in carrying out his official duties. When the criminal charges against him were dismissed, he sought reimbursement from Citrus Commission funds for the cost of defending himself against the charges. In a letter dated November 9, 1971, this office advised the chairman of the Citrus Commission that, under the general rule followed in AGO's 069-40 and 071-253, Commission funds should not be used for that purpose. And in State of Florida v. Huff, Case No. 73-731, opinion filed February 8, 1974, the Second District Court of Appeal took a similar view when it reversed the trial court's ruling that the member was entitled to recover the costs of his successful legal defense from Citrus Commission funds.

Your question is, therefore, answered in the negative.

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IMMUNITY OF STATE ATTORNEY

Number: AGO 88-16

Issued April 27, 1988

Subject: Immunity of state attorney

The Honorable Michael J. Satz
State Attorney
Seventeenth Judicial Circuit
Suite 600 Broward County Courthouse
Fort Lauderdale, Florida 33301

RE: STATE ATTORNEY–INVESTIGATORS–SOVEREIGN IMMUNITY–TORTS– immunity from civil liability for state attorney and special organized crime investigators. s. 27.251, F.S.

Dear Mr. Satz:

This is in response to your request for an opinion on substantially the following questions:

1. What immunity from civil liability do the State Attorney and the special organized crime investigators employed by the State Attorney pursuant to s. 27.251, F.S., enjoy?

2. What is the State Attorney's personal civil liability for the actions of special organized crime investigators employed pursuant to s. 27.251, F.S.?

3. Are the actions of the special organized crime investigators within the scope of the State Attorney's responsibilit that the Division of Risk Management will pay any judgment entered against the State Attorney and assign an attorney to

represent the State Attorney fully in the event of a lawsuit concerning the activities of this organized crime unit?

In summary:

1. A State Attorney possesses absolute immunity from civil liability in tort actions brought in state courts and in Title 42 U.S.C. s. 1983 actions in federal courts for conduct falling within the scope of his or her prosecutorial duties. In carrying out administrative or investigative functions, however, a prosecutor enjoys only qualified, good faith, immunity. Qualified immunity is enjoyed by investigative officers, such as special organized crime investigators, under the provisions of Title 42 U.S.C. s. 1983. A special organized crime investigator is protected by the provisions of s. 768.28, F.S., from personal liability in tort for actions which come within the scope of his or her employment or function unless the investigator "acted in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property."

2. Pursuant to Title 42 U.S.C. s. 1983, a State Attorney may not be held liable on a theory of *respondeat superior* or vicarious liability for actions of a special organized crime investigator as such an investigator is responsible for his or her own actions. The exclusive remedy under s. 768.28, F.S., for damages resulting from the actions of a special organized crime investigator would be an action against the State Attorney employing the investigator. Such action would be brought against the State Attorney in his or her official capacity, not personally, and would subject the State Attorney to no personal liability.

3. A determination of whether the actions of a special organized crime investigator are within the scope of the State Attorney's responsibilities for purposes of payment of judgments and assignment of legal counsel by the Division of Risk Management must be made by the division on a case-by-case basis.

Questions One and Two

As your first and second questions are related, they will be answered together.

The State Attorney of each judicial circuit is authorized to employ any municipal or county police officer or sheriff's deputy on a full-time basis as a special organized crime investigator for the State Attorney's office. Such investigators serve on a special task force to investigate matters involving organized crime with arrest powers throughout the particular judicial circuit.[1] A special organized crime investigator is declared to be a law enforcement officer of the state under the direction and control of the State Attorney who employs him or her.[2] Section 27.255(3), F.S., provides that "[i]n the performance of any of the powers, duties, and functions authorized by law or this section, investigators employed by a state attorney or appointed pursuant to the provisions of s. 27.251 shall have the same rights, protections, and immunities afforded other peace or law enforcement officers."

Liability under Title 42 U.S.C. s. 1983

Title 42 U.S.C. s. 1983 provides that "every person" who acts under color of state law to deprive another of a constitutional right shall be answerable to that person in a suit for damages.[3] The courts have been reluctant to clothe any person with immunity which would frustrate the statute's design of providing vindication to those wronged by the misuse of state power.[4] For this reason immunities are extended to government officials only when "overriding considerations of public policy nonetheless deman[d] that the official be given a measure of protection from personal liability" to ensure his or her ability to function effectively.[5]

A prosecutor, for reasons of public policy, enjoys absolute immunity under the common law from civil liability in tort actions brought in state courts and in Title 42 U.S.C. s. 1983 actions in federal court, when acting within the scope of his or her prosecutorial duties.[6] The United States Supreme Court has described the rationale for such immunity as follows:

"The common-law immunity of a prosecutor is based upon the same considerations that underlie the common-law immunities of judges and grand jurors acting within the scope of their duties. These include concern that harassment by unfounded litigation would cause a deflection of the prosecutor's energies from his public duties, and the possibility that he would shade his decisions instead of exercising the independence of judgment required by his public trust."[7]

A distinction has been made by the courts between prosecutorial activities (also described as quasi-judicial activities) and investigative or administrative conduct by a prosecutor. As the United States Court of Appeals, Eleventh Circuit, recently determined, it is not the status of prosecutor but the functional nature of a prosecutor's activities upon which immunity turns.[8] The court stated that "[a] prosecutor has absolute immunity only when engaged in activities intimately associated with the judicial process, such as initiating a prosecution and presenting the state's case."[9] A prosecutor enjoys only a qualified, good faith, immunity when carrying out administrative or investigative functions.[10] Similarly, an investigative officer, such as a special organized crime investigator is entitled to a qualified, good faith immunity from liability for his or her investigative actions.[11] The test for qualified immunity is an objective one: whether the conduct of a governmental official "violate[s] clearly established statutory or constitutional rights of which a reasonable person would have known."[12] The determination of whether the activities of a State Attorney or a special organized crime investigator fall within a zone of protection must be made by a court on a case-by-case basis.[13]

With regard to an action against the State Attorney under Title 42 U.S.C. s. 1983 for the actions of a special organized crime investigator, a supervisory official may not be held liable under section 1983 on a respondeat superior or vicarious liability theory.[14] Under provisions of this statute an official is held liable for his or her personal actions.

Liability under s. 768.28, F.S.

The Legislature, by enacting s. 768.28, F.S., has waived the State's immunity from tort liability to the extent provided therein. Section 768.28(1), F.S., waives sovereign immunity in tort actions against the state or its agencies or subdivisions to recover money damages for injury or loss of property, personal injury, or death caused by an employee of the agency or subdivision. Such injury or damage must have been sustained while the employee was acting within the scope of his or her office or employment and under circumstances in which the state would be liable if it were a private person.[15]

Limited immunity from civil liability in tort actions for certain officers and employees of the state or its subdivisions is provided by s. 768.28(9)(a), F.S., as follows:

"No officer, employee, or agent of the state or of any of its subdivisions shall be held personally liable in tort or named as a party defendant in any action for any injury or damage suffered as a result of any act, event, or omission of action in the scope of his employment or function, unless such officer, employee, or agent acted in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property . . . . The exclusive remedy for injury or damage suffered as a result of an act, event, or omission of an officer, employee, or agent of the state or any of its subdivisions or constitutional officers shall be by action against the governmental entity, or the head of such entity in his official capacity, or the constitutional officer of which the officer, employee, or agent is an employee, unless such act or omission was committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property. The state or its subdivisions shall not be liable in tort for the acts or omissions of an officer, employee, or agent committed while acting outside the course and scope of his employment or committed

faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property."

As used in this act, "state agencies or subdivisions" include the judicial branch.[16] The State Attorney has been determined to be a part of the judicial branch of government for purposes of s. 768.28, F.S.[17] However, Florida courts have determined that "the conduct of a state attorney in the exercise of his prosecutorial duties qualifies as a discretionary governmental function the performance of which is not affected by the statute waiving sovereign immunity." Thus, the adoption of s. 768.28, F.S., did not abrogate the long-held common law immunity of public prosecutors discussed above.[18]

With regard to liability of a special organized crime investigator employed pursuant to s. 27.251, F.S., the provisions of s. 768.28(9)(a), F.S., supra, would protect such an investigator from personal liability in a tort action brought as a result of "any injury or damage suffered as a result of any act, event, or omission of action in the scope of his employment or function" unless the investigator "acted in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety or property." The exclusive remedy for injury or damage suffered as a result of an act, event, or omission of such an investigator is an action against the State Attorney, in his or her official capacity.[19] Such an action against a State Attorney does not subject the State Attorney to personal liability but limits recovery to an action against the prosecutor in his or her official capacity.[20]

Question Three

With regard to your third question, a determination of whether certain actions taken by investigators employed pursuant to s. 27.251, F.S., are within the scope of the State Attorney's responsibility for purposes of payment of judgments and assignment of legal counsel by the Department of Insurance, Division of Risk Management, must be made by that agency. Such a determination must be based on the facts involved in each case.

However, to provide you with some general guidance in this area, I note that s. 284.30, F.S., establishes a state self-insurance fund designated as the "Florida Casualty Insurance Risk Management Trust Fund" which is to provide insurance for, among other things, general liability and federal civil rights actions and court-awarded attorney's fees in other proceedings against the state. Section 284.31, F.S., describes the scope and types of coverage to be provided by the Insurance Risk Management Trust Fund, which, pursuant to the statute, shall "cover all departments of the State of Florida and their employees, agents, and volunteers . . . ." The insurance programs developed in Part II, Ch. 284, F.S.,[21] provide that, with regard to a claim for damages in a tort action against the state, the limits of liability are those provided in s. 768.28, F.S.[22] However, such limits of liability do not apply to civil rights actions arising out of 42 U.S.C. s. 1983, or similar federal statutes.[23] Thus, to the extent determined by the Department of Insurance, Division of Risk Management, it would appear that the insurance programs described in Part II, Ch. 284, F.S., would provide insurance coverage for general liability and federal civil rights actions and court-awarded attorney's fees in actions brought against special organized crime investigators or the State Attorney as described herein.

In summary, a State Attorney possesses absolute immunity under the common law from civil liability in tort actions brought in state courts and in Title 42 U.S.C. s. 1983 actions in federal courts for actions which fall within the scope of his or her prosecutorial duties. However, a prosecutor enjoys only qualified immunity when carrying out administrative or investigative functions. Such qualified immunity under Title 42 U.S.C. s. 1983 is also enjoyed by other investigative officers, such as a special organized crime investigator. Pursuant to this federal statute a State Attorney may not be held liable under a respondeat superior or vicarious liability theory for the actions of an investigator employed pursuant to s. [illegible], F.S., such an investigator being liable for his or her own actions. As provided in s. 768.28(9)(a), F.S., no special organ[illegible]

crime investigator would be personally liable for any injury or damages sustained as a result of an act, event or omission of action within the scope of his or her employment or function, the exclusive remedy under such circumstances being an action against the State Attorney in his or her official capacity.

Sincerely,

Robert A. Butterworth
Attorney General

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[1] Section 27.251(1), F.S. *And see* s. 27.255, F.S., which further delineates the arrest authority of such investigators, their required qualifications, rights, and immunities.

[2] Section 27.255(1), F.S.

[3] Imbler v. Pachtman, 424 U.S. 409, 417 (1976).

[4] Marrero v. City of Hialeah, 625 F.2d 499, 503 (5th Cir. 1980).

[5] Marrero, *supra*.

[6] Berry v. State, 400 So.2d 80, 84 (4 D.C.A. Fla., 1981).

[7] Imbler, *supra* at 422-423. *And see,* Weston v. State, 373 So.2d 701, 703 (1 D.C.A. Fla., 1979).

[8] Kadivar v. Stone, 804 F.2d 635 (11th Cir. 1986).

[9] Kadivar, *supra* at 637. *See also* Imbler, *supra*; Marrero, *supra*.

[10] Kadivar, *supra*. *And see* McSurely v. McClellan, 697 F.2d 309 (D.C. Cir. 1982).

[11] *See* McSurely, *supra* at 319. *And see* Marrero, *supra* at 508; Rich v. Dollar, Case No. 87-5028 (11th Cir. April 15, 1988).

[12] McSurely, *supra* at 320.

[13] As the court recognized in Kadivar v. Stone, *supra* at 637, it is the trial court which must determine whether particular activities constitute part of the respondent/defendant's role as advocate rather than as investigator or administrator. While no exhaustive attempt to delineate investigative or administrative activity as opposed to prosecutorial or quasi-judicial conduct is made here, examples of such activities may be found in judicial opinions such as Marrero v. City of Hialeah, *supra* at 505 (5th Cir. 1980) (interviewing grand jury witnesses may be classified as quasi-judicial while "a prosecutor who assists, directs or otherwise participates with, the police in obtaining evidence prior to an indictment undoubtedly is functioning more in his investigative capacity. . . .") *See also* Imbler, *supra*; Lloyd v. Hines, 474 So.2d D.C.A. Fla., 1985).

[14] *See* Carr v. Bell, 492 F. Supp. 832, 835 (N.D. Fla., 1980); Lloyd, *supra* at 379 (a supervisory official may not be held liable under s. 1983 on a respondeat superior or vicarious liability theory).

[15] *See also* s. 768.28(5), F.S., establishing the monetary limitations of the state's waiver of sovereign immunity at $100,000 for a claim or judgment by one person or $200,000 for all claims or judgments arising out of the same incident or occurrence.

[16] Section 768.28(2), F.S.

[17] *See* Weston, *supra*.

[18] Weston, *supra*, and Berry, *supra* at 84.

[19] Section 768.28(9)(a), F.S. *And see* s. 768.28(3), F.S., providing that an agency or subdivision may request the assistance of the Department of Insurance in the consideration, adjustment, and settlement of any claim under this section.

[20] *And see* s. 111.07, F.S., which states, in part, that:

"Any agency of the state, or any county, municipality, or political subdivision of the state, is authorized to provide an attorney to defend any civil action arising from a complaint for damages or injury suffered as a result of any act or omission of action of any of its officers, employees, or agents for an act or omission arising out of and in the scope of his employment or function, unless, in the case of a tort action, the officer, employee, or agent acted in bad faith, with malicious purpose, or in a manner exhibiting wanton and willful disregard of human rights, safety, or property. Defense of such civil action includes, but is not limited to, any civil rights lawsuit seeking relief personally against the officer, employee, or agent for an act or omission under color of state law, custom, or usage, wherein it is alleged that such officer, employee, or agent has deprived another person of his rights secured under the Federal Constitution or laws."

[21] Sections 284.30-284.42, F.S.

[22] *Id.* at footnote 15.

[23] Section 284.38, F.S.

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Attorney General's Policy Memorandum Regarding Outside Counsel for the State of Florida

Dose of Reality Florida

Request for Proposal for Professional Legal Services – Roku

Crime Prevention Summit

Office of the Attorney General
State of Florida
PL-01, The Capitol
Tallahassee, FL 32399-1050

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County's reimbursement of official's attorney fees

Number: AGO 90-74

Date: October 31, 1996

Subject:
County's reimbursement of official's attorney fees

Mr. Frederick B. Karl
County Attorney
Hillsborough County
Post Office Box 1110
Tampa, Florida 33601

RE: COUNTIES--ATTORNEYS FEES--PUBLIC FUNDS--reimbursement of public official for reasonable legal expenses incurred in successful defense of ethics charge.

Dear Mr. Karl:

You have asked for my opinion on the following question:

May Hillsborough County voluntarily expend public money to reimburse a public official or a county employee for reasonable legal expenses incurred in the successful defense of an ethics charge?

In sum:

Hillsborough County may voluntarily reimburse a public official or a county employee for reasonable legal expenses incurred in the successful defense of an ethics charge if the county determines that the ethics charge arose from the performance of official duties and while serving a public purpose.

According to your letter, Hillsborough County has established a policy which authorizes the county to reimburse its public officials and employees for their reasonably incurred legal expenses. This policy applies in instances where officials and employees successfully defend against charges of a violation of the Code of Ethics for Public Officers and Employees, Part III, Ch. 112, F.S. The county is reevaluating this policy in light of *Chavez v. City of Tampa*,[1] a case in which the court held that a city was not required to provide reimbursement from city funds for legal expenses a city council member incurred in successfully defending an ethics charges.

In AGO 85-51 this office concluded that the City of Kissimmee was authorized to pay for the defense of its former city manager who was charged with an ethics violation which was subsequently dismissed. Payment of such expenses was conditioned on the city's governing body determining that the alleged misconduct arose from the performance of the manager's official duties and occurred while he was serving a public purpose. This conclusion was based primarily on the common law principles discussed and applied in Ellison v. Reid, 397 So.2d 352

(1 D.C.A. Fla., 1981).

In *Ellison*, a county property appraiser successfully defended against charges of official misconduct before the Commission on Ethics. In his office budget the property appraiser had included an amount for the payment of his attorney's fees. When a claim was presented to the Auditor General, he determined that such an expenditure of public funds was improper because it served the appraiser's private purpose rather than a public purpose. The appraiser then obtained a declaratory judgment that the expenditure was proper where he was acting in his official capacity and was engaged in the performance of his duties at the time the alleged misconduct occurred. On appeal, the First District Court of Appeal affirmed the trial court's award of fees and stated that:

"There is no doubt a valuable public purpose is served in protecting the effective operation and maintenance of the administration of a public office. If a public officer is charged with misconduct while performing his official duties and while serving a public purpose, the public has a primary interest in such a controversy and should pay the reasonable and necessary legal fees incurred by the public officer in successfully defending against unfounded allegations of official misconduct."[2]

In Chavez v. City of Tampa,[3] Ms. Chavez filed suit seeking reimbursement from the city for legal expenses she had incurred in successfully defending a charge of unethical conduct before the Florida Commission on Ethics.

The charge resulted from Chavez's vote, as a city council member, on her petition for an alcoholic beverage zoning classification at business premises she had leased. Prior to her vote, Ms. Chavez had inquired of the city attorney whether her participation in the voting would constitute a conflict of interest. Based on his response, she abstained from the initial vote on the motion to send her own petition to the legal department for drafting into an ordinance. However, Ms. Chavez's abstention resulted in a tie vote which killed her petition and precluded its renewal for at least 12 months. When the announcement of the motion's defeat was made, Chavez declared that she had changed her mind, that she would vote on the motion whether there was a conflict or not. When the new vote was taken, Ms. Chavez voted for the motion and broke the tie. Her petition was revived and moved forward to the next step in the process, and was subsequently returned to the council for further action.

A complaint was filed against Chavez alleging that her tiebreaking vote had violated a provision of the Florida Ethics Code against voting conflicts.[4] Probable cause was found by the Florida Ethics Commission to proceed with an investigation of the violation. At this time she retained counsel and defended the charges before the commission. A hearing was held before a hearing officer and he determined that Ms. Chavez's vote was merely preliminary and procedural and not a vote on the substance of the ordinance itself. Based on that conclusion, the hearing officer recommended a finding that no violation occurred. The hearing officer's recommendation was adopted by the commission and the complaint against Ms. Chavez was dismissed.

Ms. Chavez requested that the city reimburse her legal expenses in defending herself before the commission. The city council declined to do so and she filed suit. Although at the trial level the court ordered the city to reimburse her attorney's fees and costs, it awarded an amount less than

she had requested. Ms. Chavez then filed an appeal.

The District Court of Appeal rejected Ms. Chavez's argument that she was entitled to reimbursement of attorney's fees under s. 111.07, F.S. This section states that fee awards are authorized "to defend any civil action arising from a complaint for damages or injury suffered." The court determined that this statute "contemplates a judicial proceeding in a court of law, before a judicial officer . . . ."[5] Since the Commission on Ethics is a part of the legislative branch, the court held that "proceedings before that investigative body can not be 'civil actions.'" Therefore, the statute did not apply.

The court went on to consider whether Ms. Chavez was entitled to these costs and fees under a common law theory of entitlement and determined that she was not. The court cited Lomelo v. City of Sunrise,[6] for the proposition that a city has no discretion to deny reimbursement of fees to a public official in defending either civil or criminal proceedings where the "conduct complained of arises out of or in connection with the performance of his official duties [and that the] obligation arises independent of statute, ordinance, or charter. . . ." The court set forth the two pronged test which must be satisfied in order to compensate a public official for legal defense expenditures: "[T]he lawsuit [must] arise from (1) the performance of the officer's *official duties* and (2) while serving a *public purpose*."[7] (Emphasis of the court.) The court determined that Ms. Chavez had advanced her own private pecuniary interests by her vote and, therefore, failed to satisfy the second condition for entitlement to payment of legal expenses from the public coffers under a common law theory.

Thus, if Hillsborough County makes a determination that acts alleged in an ethics complaint against an official or employee of the county arose from the officer's or employee's official duties and that a public purpose was being served at the time of such acts, the reimbursement of legal expenses for the officer or employee would appear to be authorized under the *Chavez* case. However, such a determination must be made by the governing body of the county based on such factual evidence as the governing body may require; such a determination is beyond the authority of this office.[8]

Sincerely,

Robert A. Butterworth
Attorney General

RAB/tgh

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[1] 560 So.2d 1214 (2 D.C.A. Fla., 1990).

[2] 397 So.2d 354. *And see* Markham v. State, Department of Revenue, 298 So.2d 210 (1 D.C.A. Fla., 1974), stating the general principle that public officers are entitled to a defense at the expense of the public in defending against litigation arising from the performance of official duties and while serving a public purpose. *See also* Lomelo v. City of Sunrise, 423 So.2d 974 (4 D.C.A. Fla., 1982), *petition for review dismissed,* 431 So.2d 988 (Fla. 1983), noting that the

common law obligation to pay attorney's fees arises independently of statute. *Cf.* s. 111.07, F.S. (agency of state, county, municipality, or political subdivision authorized to provide attorney to defend civil action arising from complaint for damages, or injury suffered as a result of act or omission of officers acting within scope of employment and mandating reimbursement of fees paid by defendant who prevails against such complaint for damages or injury).

[3] *Supra* at n. 1.

[4] Section 112.3143(3), F.S. (1985), was the statute which Ms. Chavez was alleged to have violated; this section prohibits a public officer from voting officially on any measure which inures to his or her special private gain.

[5] 560 So.2d at 1216-1217. *And see* City of Fort Walton Beach v. Grant, 544 So.2d 230 (1 D.C.A. Fla., 1989) (court determined that city councilman was entitled to reimbursement for legal fees under s. 111.07, F.S.).

[6] 423 So.2d 974 (4 D.C.A. Fla., 1982).

[7] 560 So.2d at 1218. *Citing Lomelo* at 976.

[8] *See* s. 16.01(3) and AGO 85-51.

Immunity and liabilty of chief judge

Number: AGO 89-02

Date: December 18, 1997

Subject:
Immunity and liabilty of chief judge

The Honorable Philip A. Federico
Chief Judge
Sixth Judicial Circuit
Office of the Courts Administrator
150-5th Street North
St. Petersburg, Florida 33701

RE: JUDGES–JUDICIAL IMMUNITY–PROCESS–SERVICE OF PROCESS–immunity and legal representation of chief judge in civil action for tortious conduct; satisfaction of judgment.

Dear Judge Federico:

You have asked substantially the following questions:

1. Would the chief judge of a judicial circuit, who is acting pursuant to the provisions of Ch. 48, F.S., as amended by Ch. 88-135, Laws of Florida, and Rule 2.050, Fla.R.Jud.Amin., be clothed with judicial immunity from civil liability for actions taken pursuant to that chapter?

2. If the chief judge were sued for an allegedly tortious act under 42 U.S.C. s. 1983 or other civil rights legislation, would the Attorney General's Office provide representation for the judge?

3. If the chief judge were found liable in tort for actions taken pursuant to Ch. 48, F.S., as amended by Ch. 88-135, Laws of Florida, would the Division of Risk Management satisfy any judgment entered against the judge?

In summary:

1. The actions of a chief judge taken pursuant to Ch. 48, F.S., as amended by Ch. 88-135, Laws of Florida, appear to be administrative or ministerial in nature and thus a chief judge is entitled to a qualified, good faith immunity from liability in Title 42 U.S.C. s. 1983 actions when carrying out such functions. Pursuant to the provisions of Title 42 U.S.C. s. 1983 a chief judge may not be held liable on a theory of *respondeat superior* or vicarious liability for the actions of a process server certified pursuant to Ch. 48, F.S.

Florida courts have not made a distinction between judicial and ministerial actions by judges, therefore, in tort actions brought in Florida courts, judges currently enjoy absolute immunity from damages liability for acts performed in the course of their judicial capacities unless such acts are undertaken with a clear absence or jurisdiction.

2. Pursuant to s. 111.07, F.S., the Department of Legal Affairs may, in its discretion, represent a chief judge in a tort action brought in state court or in a Title 42 U.S.C. s. 1983 action in federal court.

3. A determination of whether the actions of a chief judge are within the scope of his or her judicial responsibilities for purposes of payment of judgments by the Division of Risk Management must be made by the division on a case-by-case basis.

QUESTION ONE

Section 2, Ch. 88-135, Laws of Florida, creates the "Florida Certified Process Server Act," ss. 48.25-48.31, F.S. The act authorizes the chief judge of each judicial circuit to establish an approved list of persons designated as certified process servers. As provided in the statute, "[e]ach person whose name has been added to the approved list is subject to annual recertification and reappointment by the chief judge of a judicial circuit."[1] Those persons on the list are authorized to serve initial nonenforceable civil process within the judicial circuit where they are certified when a civil action has been filed in the circuit or county court.[2]

A list of process servers which has been approved by the chief judge of the circuit is to be maintained by the circuit court administrator and the clerk of the court in each county in the circuit.[3] Upon filing an action in the circuit or county court, a person may select a certified process server from the list to serve initial nonenforceable civil process.[4] As provided in the act, a person seeking to add his or her name to the approved list in any circuit shall submit an application to the chief judge of the circuit or the judge's designee on a court prescribed form.[5]

A person must meet certain statutory requirements in order to become a certified process server including attaining the age of 18, having no mental or legal disability, being a permanent resident of the state, and submitting to a background investigation. The chief judge of the circuit may require that applicants submit to an examination testing their knowledge of the laws and rules regarding the service of process and may, periodically, prescribe additional rules and requirements for the eligibility of applicants.[6] A person seeking the addition of his or her name to the approved list of certified process servers shall also:

"Execute a bond in the amount of $5,000 with a surety company authorized to do business in this state for the benefit of any person wrongfully injured by any malfeasance, misfeasance, neglect of duty, or incompetence of the applicant in connection with his duties as a process server . . . ."[7]

Liability under Title 42 U.S.C. s. 1983

Title 42 U.S.C. s. 1983 provides that "[e]very person" who acts under color of state law to deprive another of a constitutional right shall be answerable to that person in a suit for damages. The courts have, however, accepted that "[e]very person," means "every person *except* judges."[8]

As a general rule, a judge is not liable for acts done in the exercise of a judicial function, within the limits of his or her jurisdiction, no matter how erroneous, illegal, or malicious those acts may

be. The term "jurisdiction," in the context of judicial immunity, means the judicial power to hear and determine a matter, not the manner, method, or correctness of the exercise of that power.[9]

However, judicial immunity does not automatically attach to all the types of conduct in which a judge may properly engage, but only to those acts which are of a judicial or quasi-judicial nature. The broad doctrine of judicial immunity does not apply to acts which are not judicial, but which are purely ministerial or administrative in nature. Thus, when a judge acts ministerially or is required to do a ministerial act, he is responsible for error or misconduct in like manner and to the same extent as all other ministerial officers and may enjoy a qualified good faith immunity from civil action.[10] The test for qualified immunity is an objective one: whether the conduct of a governmental official violates clearly established statutory or constitutional rights of which a reasonable person would have known.[11] This test "focuses on the objective legal reasonableness of an official's act."[12]

In Forrester v. White, 108 S.Ct. 538 (1988), the U.S. Supreme Court considered whether a state court judge had absolute immunity from a suit for damages under 42 U.S.C. s. 1983 for his decision to dismiss a subordinate court employee. The employee, who had been a probation officer, alleged that she was demoted and discharged because of her sex, in violation of the Equal Protection Clause of the Fourteenth Amendment. The Court concluded that the judge's decisions were not judicial acts for which he should be absolutely immune. While the Court recognized that it has never articulated a precise and general definition of the class of acts entitled to judicial immunity, it suggested a distinction between judicial acts and the administrative, legislative, or executive functions that judges may occasionally be assigned by law to perform. As the Court noted, "[a]dministrative decisions, even though they may be essential to the very functioning of the courts, have not . . . been regarded as judicial acts."[13] While certain actions taken in demoting and discharging the petitioner in *Forrester*, like many others involved in supervising court employees and overseeing the efficient operation of a court, may have been important in providing the necessary conditions of a sound adjudicative system, the Court found them to be administrative actions which could not meaningfully be distinguished from employment decisions made by other executive branch officials.

Similarly, the actions of a chief judge in implementing the provisions of the "Florida Certified Process Server Act," would appear to be administrative or ministerial rather than judicial actions.[14] Implementation of the act affords little or no discretion to the chief judge and does not require the judge to perform any judicial or quasi-judicial tasks. Therefore, a chief judge would possess only a qualified good faith immunity for his or her actions under the Florida Certified Process Server Act.

Moreover, a chief judge would not be held liable for the actions of a certified process server in any action brought under Title 42 U.S.C. s. 1983. The provisions of the statute hold an official liable for his or her personal actions and do not permit recovery on a *respondeat superior* or vicarious liability theory.[15]

Liability under s. 768.28, F.S.

The Legislature, by enacting s. 768.28, F.S., has waived the State's immunity from tort liability to the extent provided therein. Section 768.28(1), F.S., waives sovereign immunity in tort actions

against the state or its agencies or subdivisions to recover money damages for injury or loss of property, personal injury, or death caused by an employee of the agency or subdivision. Such injury or damage must have been sustained while the employee was acting within the scope of his or her office or employment and under circumstances in which the state would be liable if it were a private person.[16]

Limited immunity from civil liability in tort actions for certain officers and employees of the state or its subdivisions is provided by s. 768.28(9)(a), F.S., as follows:

"No officer, employee, or agent of the state or of any of its subdivisions shall be held personally liable in tort or named as a party defendant in any action for any injury or damage suffered as a result of any act, event, or omission of action in the scope of his employment or function, unless such officer, employee, or agent acted in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property. . . . The exclusive remedy for injury or damage suffered as a result of an act, event, or omission of an officer, employee, or agent of the state or any of its subdivisions or constitutional officers shall be by action against the governmental entity, or the head of such entity in his official capacity, or the constitutional officer of which the officer, employee, or agent is an employee, unless such act or omission was committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property. The state or its subdivisions shall not be liable in tort for the acts or omissions of an officer, employee, or agent committed while acting outside the course and scope of his employment or committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property."

As used in this act, "state agencies or subdivisions" include the judicial branch.[17] Without question a chief judge of a judicial circuit is a part of the judicial branch of government. However, Florida courts have determined that the common law principle of judicial immunity was not affected by the enactment of s. 768.28, F.S., and, consequently, judges continue to enjoy absolute immunity from damages liability for acts performed in the course of their judicial capacities unless such acts are undertaken with a clear absence of jurisdiction.[18] While recent federal case law recognizes a distinction between judicial actions and those of an administrative or ministerial nature for purposes of judicial immunity, I am not aware of any Florida case law which has yet made such a distinction in a tort action.

No consideration is given or opinion expressed herein regarding whether a process server certified pursuant to Ch. 48, F.S., as amended by Ch. 88-135, Laws of Florida, is an "officer, employee, or agent of the state or any of its subdivisions" for purposes of s. 768.28, F.S.[19] Such a determination is a mixed question of law and fact which must ultimately be made by a court not by this office. However, in the event an action is brought against a chief judge for injury or damages suffered as a result of an act, event, or omission of a certified process server, such action would be against the chief judge in his or her official capacity.[20] Such an action against a chief judge would not subject the judge to personal liability but would limit recovery to an action against the judge in his or her official capacity.

QUESTION TWO

Section 111.07, F.S., provides in part that "[l]egal representation of an officer, employee, or agent of a state agency *may be provided* by the Department of Legal Affairs." (e.s.) The word "may" is usually employed as implying permissive or discretionary action rather than mandatory conduct.[21]

Thus, the Department of Legal Affairs possesses the discretion, rather than any mandatory duty, to provide legal representation pursuant to s. 111.07, F.S.[22]

QUESTION THREE

A determination of whether the actions taken by a chief judge pursuant to Ch. 48, F.S., as amended, are within the scope of the judge's responsibility for purposes of payment of judgments by the Department of Insurance, Division of Risk Management, must be made by that agency. Such a determination must be based on the facts involved in each case.[23]

In an effort to provide you with some general guidance, however, I note that s. 284.30, F.S., establishes a state self-insurance fund designated as the "Florida Casulaty Insurance Risk Management Trust Fund" which is to provide insurance for, among other things, general liability and federal civil rights actions and court-awarded attorney's fees in other proceedings against the state. Section 284.31, F.S., describes the scope and types of coverage to be provided by the Insurance Risk Management Trust Fund, which, pursuant to the statute, shall "cover all departments of the State of Florida and their employees, agents, and volunteers . . . ." The insurance programs developed in Part II, Ch. 284, F.S.,[24] provide that, with regard to a claim for damages in a tort action against the state, the limits of liability are those provided in s. 768.28, F.S.[25] However, such limits of liability do not apply to civil rights actions arising out of 42 U.S.C. s. 1983, or similar federal statutes.[26] Thus, to the extent determined by the Department of Insurance, Division of Risk Management, it would appear that the insurance programs described in Part II, Ch. 284, F.S., would provide insurance coverage for general liability and federal civil rights actions and court-awarded attorney's fees in actions brought against a chief judge as described herein.

Sincerely,

Robert A. Butterworth
Attorney General

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[1] Section 48.27(1), F.S., as created by s. 3, Ch. 88-135, Laws of Florida.

[2] Section 48.27(2), Ch. 88-135, *supra*. *And see* AGO 89-1, which defines "initial nonenforceable civil process" as that initial civil process which is not required by statute to be served by the sheriff.

[3] Section 48.29(1), as created by s. 4, Ch. 88-135, *supra*.

[4] Section 48.27(2), as created by s. 3, Ch. 88-135, *supra*.

[5] Section 48.29(2), as created by s. 4, Ch. 88-135, *supra*.

[6] Sections 48.29(3) and (4), Ch. 88-135, *supra*.

[7] Section 48.29(3)(g), Ch. 88-135, *supra*.

[8] *See* Harper v. Merckle, 638 F.2d 848, 856 (5th Cir. 1981). *And see* Dykes v. Hosemann, 776 F.2d 942 (11th Cir. 1985).

[9] 48A C.J.S. *Judges* s. 86

[10] *Id.* at s. 90.

[11] Harlow v. Fitzgerald, 102 S.Ct. 2727, 2738 (1982) ("Where an official could be expected to know that certain conduct would violate statutory or constitutional rights, he should be made to hesitate; and a person who suffers injury caused by such conduct may have a cause of action. But where an official's duties legitimately require action in which clearly established rights are implicated, the public interest may be better served by action taken 'with independence and without fear of consequences.'"). *Harlow* at 2739). *And see* Malley v. Briggs, 106 S.Ct. 1092 (1986).

[12] *Harlow, supra* at 2739. *And see* Brown v. Clewiston, 644 F.Supp. 1417 (S.D. Fla., 1986) ("An officer's actual good faith belief in the propriety of his actions is not really relevant after *Harlow*. The only inquiry is whether a reasonable person in the officer's position could have believed his actions were lawful." *Id.* at 1419, footnote 3).

[13] Forrester v. White, 108 S.Ct. 538, 544 (1988).

[14] *Cf.* Rule 2.050 Fla.R.Jud.Admin., which fixes *administrative* responsibility in the chief judges of the circuit courts and which provides that "[t]he chief judge shall exercise *administrative* supervision over all courts within the judicial circuit in the exercise of judicial powers and over the judges and officers of the courts." (e.s.)

[15] *See* Carr v. Bell, 492 F.Supp. 832, 835 (N.D. Fla., 1980); Lloyd v. Hines, 474 So.2d 376, 379 (1 D.C.A. Fla., 1985) (a supervisory official may not be held liable under s. 1983 on a *respondeat superior* or vicarious liability theory). *Cf.* AGO 88-16, discussing the state and federal tort liability of a state attorney.

[16] *See also* s. 768.28(5), F.S., establishing the monetary limitations of the state's waiver of sovereign immunity at $100,000 for a claim or judgment by one person or $200,000 for all claims or judgments arising out of the same incident or occurrence.

[17] Section 768.28(2), F.S.

[18] Berry v. State, 400 So.2d 80, 83 (4 D.C.A. Fla., 1981), *petition for review denied*, 411 So.2d

380 (Fla.1981). *And see* Salfi v. Ising, 464 So.2d 687, 688 (5 D.C.A. Fla., 1985).

[19] *Cf.* s. 48.29(3)(g), as created by s. 4, Ch. 88-135, Laws of Florida, which requires a certified process server to "[e]xecute a bond in the amount of $5,000 with a surety company authorized to do business in this state for the benefit of any person wrongfully injured by any malfeasance, misfeasance, neglect of duty, or incompetence of the applicant in connection with his duties as a process server."

[20] Section 768.28(9)(a), F.S. *And see* s. 768.28(3), F.S., providing that an agency or subdivision may request the assistance of the Department of Insurance in the consideration, adjustment, and settlement of any claim under this section.

[21] *See* 57 C.J.S. *May* (1948) pp. 456-457.

[22] *See* Nuzum v. Valdes, 407 So.2d 277 (3 D.C.A. Fla., 1981), concluding, in part, that the activation of the statute entitling public officers to representation at the public's expense in certain cases was primarily an executive function.

[23] *Cf.* interoffice memorandum prepared by Division of Risk Management on request from State Attorney Michael J. Satz for clarification of division's position relating to payment of judgments by the Department of Insurance, Division of Risk Management.

[24] Sections 284.30-284.42, F.S.

[25] *Supra* at footnote 21.

[26] Section 284.38, F.S.

Immunity of state attorney

Number: AGO 88-16

Date: December 19, 1997

Subject:
Immunity of state attorney

The Honorable Michael J. Satz
State Attorney
Seventeenth Judicial Circuit
Suite 600 Broward County Courthouse
Fort Lauderdale, Florida 33301

RE: STATE ATTORNEY–INVESTIGATORS–SOVEREIGN IMMUNITY–TORTS– immunity from civil liability for state attorney and special organized crime investigators. s. 27.251, F.S.

Dear Mr. Satz:

This is in response to your request for an opinion on substantially the following questions:

1. What immunity from civil liability do the State Attorney and the special organized crime investigators employed by the State Attorney pursuant to s. 27.251, F.S., enjoy?

2. What is the State Attorney's personal civil liability for the actions of special organized crime investigators employed pursuant to s. 27.251, F.S.?

3. Are the actions of the special organized crime investigators within the scope of the State Attorney's responsibilities so that the Division of Risk Management will pay any judgment entered against the State Attorney and assign an attorney to represent the State Attorney fully in the event of a lawsuit concerning the activities of this organized crime unit?

In summary:

1. A State Attorney possesses absolute immunity from civil liability in tort actions brought in state courts and in Title 42 U.S.C. s. 1983 actions in federal courts for conduct falling within the scope of his or her prosecutorial duties. In carrying out administrative or investigative functions, however, a prosecutor enjoys only qualified, good faith, immunity. Qualified immunity is enjoyed by investigative officers, such as special organized crime investigators, under the provisions of Title 42 U.S.C. s. 1983. A special organized crime investigator is protected by the provisions of s. 768.28, F.S., from personal liability in tort for actions which come within the scope of his or her employment or function unless the investigator "acted in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property."

2. Pursuant to Title 42 U.S.C. s. 1983, a State Attorney may not be held liable on a theory of *respondeat superior* or vicarious liability for actions of a special organized crime investigator as

such an investigator is responsible for his or her own actions. The exclusive remedy under s. 768.28, F.S., for damages resulting from the actions of a special organized crime investigator would be an action against the State Attorney employing the investigator. Such action would be brought against the State Attorney in his or her official capacity, not personally, and would subject the State Attorney to no personal liability.

3. A determination of whether the actions of a special organized crime investigator are within the scope of the State Attorney's responsibilities for purposes of payment of judgments and assignment of legal counsel by the Division of Risk Management must be made by the division on a case-by-case basis.

Questions One and Two

As your first and second questions are related, they will be answered together.

The State Attorney of each judicial circuit is authorized to employ any municipal or county police officer or sheriff's deputy on a full-time basis as a special organized crime investigator for the State Attorney's office. Such investigators serve on a special task force to investigate matters involving organized crime with arrest powers throughout the particular judicial circuit.[1] A special organized crime investigator is declared to be a law enforcement officer of the state under the direction and control of the State Attorney who employs him or her.[2] Section 27.255(3), F.S., provides that "[i]n the performance of any of the powers, duties, and functions authorized by law or this section, investigators employed by a state attorney or appointed pursuant to the provisions of s. 27.251 shall have the same rights, protections, and immunities afforded other peace or law enforcement officers."

Liability under Title 42 U.S.C. s. 1983

Title 42 U.S.C. s. 1983 provides that "every person" who acts under color of state law to deprive another of a constitutional right shall be answerable to that person in a suit for damages.[3] The courts have been reluctant to clothe any person with immunity which would frustrate the statute's design of providing vindication to those wronged by the misuse of state power.[4] For this reason immunities are extended to government officials only when "overriding considerations of public policy nonetheless deman[d] that the official be given a measure of protection from personal liability" to ensure his or her ability to function effectively.[5]

A prosecutor, for reasons of public policy, enjoys absolute immunity under the common law from civil liability in tort actions brought in state courts and in Title 42 U.S.C. s. 1983 actions in federal court, when acting within the scope of his or her prosecutorial duties.[6] The United States Supreme Court has described the rationale for such immunity as follows:

"The common-law immunity of a prosecutor is based upon the same considerations that underlie the common-law immunities of judges and grand jurors acting within the scope of their duties. These include concern that harassment by unfounded litigation would cause a deflection of the prosecutor's energies from his public duties, and the possibility that he would shade his decisions instead of exercising the independence of judgment required by his public trust."[7]

A distinction has been made by the courts between prosecutorial activities (also described as quasi-judicial activities) and investigative or administrative conduct by a prosecutor. As the United States Court of Appeals, Eleventh Circuit, recently determined, it is not the status of prosecutor but the functional nature of a prosecutor's activities upon which immunity turns.[8] The court stated that "[a] prosecutor has absolute immunity only when engaged in activities intimately associated with the judicial process, such as initiating a prosecution and presenting the state's case."[9] A prosecutor enjoys only a qualified, good faith, immunity when carrying out administrative or investigative functions.[10] Similarly, an investigative officer, such as a special organized crime investigator is entitled to a qualified, good faith immunity from liability for his or her investigative actions.[11] The test for qualified immunity is an objective one: whether the conduct of a governmental official "violate[s] clearly established statutory or constitutional rights of which a reasonable person would have known."[12] The determination of whether the activities of a State Attorney or a special organized crime investigator fall within a zone of protection must be made by a court on a case-by-case basis.[13]

With regard to an action against the State Attorney under Title 42 U.S.C. s. 1983 for the actions of a special organized crime investigator, a supervisory official may not be held liable under section 1983 on a respondeat superior or vicarious liability theory.[14] Under provisions of this statute an official is held liable for his or her personal actions.

Liability under s. 768.28, F.S.

The Legislature, by enacting s. 768.28, F.S., has waived the State's immunity from tort liability to the extent provided therein. Section 768.28(1), F.S., waives sovereign immunity in tort actions against the state or its agencies or subdivisions to recover money damages for injury or loss of property, personal injury, or death caused by an employee of the agency or subdivision. Such injury or damage must have been sustained while the employee was acting within the scope of his or her office or employment and under circumstances in which the state would be liable if it were a private person.[15]

Limited immunity from civil liability in tort actions for certain officers and employees of the state or its subdivisions is provided by s. 768.28(9)(a), F.S., as follows:

"No officer, employee, or agent of the state or of any of its subdivisions shall be held personally liable in tort or named as a party defendant in any action for any injury or damage suffered as a result of any act, event, or omission of action in the scope of his employment or function, unless such officer, employee, or agent acted in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property . . . . The exclusive remedy for injury or damage suffered as a result of an act, event, or omission of an officer, employee, or agent of the state or any of its subdivisions or constitutional officers shall be by action against the governmental entity, or the head of such entity in his official capacity, or the constitutional officer of which the officer, employee, or agent is an employee, unless such act or omission was committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property. The state or its subdivisions shall not be liable in tort for the acts or omissions of an officer, employee, or agent committed while acting outside the course and scope of his employment or committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or

property."

As used in this act, "state agencies or subdivisions" include the judicial branch.[16] The State Attorney has been determined to be a part of the judicial branch of government for purposes of s. 768.28, F.S.[17] However, Florida courts have determined that "the conduct of a state attorney in the exercise of his prosecutorial duties qualifies as a discretionary governmental function the performance of which is not affected by the statute waiving sovereign immunity." Thus, the adoption of s. 768.28, F.S., did not abrogate the long-held common law immunity of public prosecutors discussed above.[18]

With regard to liability of a special organized crime investigator employed pursuant to s. 27.251, F.S., the provisions of s. 768.28(9)(a), F.S., supra, would protect such an investigator from personal liability in a tort action brought as a result of "any injury or damage suffered as a result of any act, event, or omission of action in the scope of his employment or function" unless the investigator "acted in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety or property." The exclusive remedy for injury or damage suffered as a result of an act, event, or omission of such an investigator is an action against the State Attorney, in his or her official capacity.[19] Such an action against a State Attorney does not subject the State Attorney to personal liability but limits recovery to an action against the prosecutor in his or her official capacity.[20]

Question Three

With regard to your third question, a determination of whether certain actions taken by investigators employed pursuant to s. 27.251, F.S., are within the scope of the State Attorney's responsibility for purposes of payment of judgments and assignment of legal counsel by the Department of Insurance, Division of Risk Management, must be made by that agency. Such a determination must be based on the facts involved in each case.

However, to provide you with some general guidance in this area, I note that s. 284.30, F.S., establishes a state self-insurance fund designated as the "Florida Casualty Insurance Risk Management Trust Fund" which is to provide insurance for, among other things, general liability and federal civil rights actions and court-awarded attorney's fees in other proceedings against the state. Section 284.31, F.S., describes the scope and types of coverage to be provided by the Insurance Risk Management Trust Fund, which, pursuant to the statute, shall "cover all departments of the State of Florida and their employees, agents, and volunteers . . . ." The insurance programs developed in Part II, Ch. 284, F.S.,[21] provide that, with regard to a claim for damages in a tort action against the state, the limits of liability are those provided in s. 768.28, F.S.[22] However, such limits of liability do not apply to civil rights actions arising out of 42 U.S.C. s. 1983, or similar federal statutes.[23] Thus, to the extent determined by the Department of Insurance, Division of Risk Management, it would appear that the insurance programs described in Part II, Ch. 284, F.S., would provide insurance coverage for general liability and federal civil rights actions and court-awarded attorney's fees in actions brought against special organized crime investigators or the State Attorney as described herein.

In summary, a State Attorney possesses absolute immunity under the common law from civil liability in tort actions brought in state courts and in Title 42 U.S.C. s. 1983 actions in federal

courts for actions which fall within the scope of his or her prosecutorial duties. However, a prosecutor enjoys only qualified immunity when carrying out administrative or investigative functions. Such qualified immunity under Title 42 U.S.C. s. 1983 is also enjoyed by other investigative officers, such as a special organized crime investigator. Pursuant to this federal statute a State Attorney may not be held liable under a respondeat superior or vicarious liability theory for the actions of an investigator employed pursuant to s. 27.251, F.S., such an investigator being liable for his or her own actions. As provided in s. 768.28(9)(a), F.S., no special organized crime investigator would be personally liable for any injury or damages sustained as a result of an act, event or omission of action within the scope of his or her employment or function, the exclusive remedy under such circumstances being an action against the State Attorney in his or her official capacity.

Sincerely,

Robert A. Butterworth
Attorney General

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[1] Section 27.251(1), F.S. *And see* s. 27.255, F.S., which further delineates the arrest authority of such investigators, their required qualifications, rights, and immunities.

[2] Section 27.255(1), F.S.

[3] Imbler v. Pachtman, 424 U.S. 409, 417 (1976).

[4] Marrero v. City of Hialeah, 625 F.2d 499, 503 (5th Cir. 1980).

[5] Marrero, *supra*.

[6] Berry v. State, 400 So.2d 80, 84 (4 D.C.A. Fla., 1981).

[7] Imbler, *supra* at 422-423. *And see,* Weston v. State, 373 So.2d 701, 703 (1 D.C.A. Fla., 1979).

[8] Kadivar v. Stone, 804 F.2d 635 (11th Cir. 1986).

[9] Kadivar, *supra* at 637. *See also* Imbler, *supra*; Marrero, *supra*.

[10] Kadivar, *supra*. *And see* McSurely v. McClellan, 697 F.2d 309 (D.C. Cir. 1982).

[11] *See* McSurely, *supra* at 319. *And see* Marrero, *supra* at 508; Rich v. Dollar, Case No. 87-5028 (11th Cir. April 15, 1988).

[12] McSurely, *supra* at 320.

[13] As the court recognized in Kadivar v. Stone, *supra* at 637, it is the trial court which must determine whether particular activities constitute part of the respondent/defendant's role as advocate rather than as investigator or administrator. While no exhaustive attempt to delineate investigative or administrative activity as opposed to prosecutorial or quasi-judicial conduct is made here, examples of such activities may be found in judicial opinions such as Marrero v. City of Hialeah, *supra* at 505 (5th Cir. 1980) (interviewing grand jury witnesses may be classified as quasi-judicial while "a prosecutor who assists, directs or otherwise participates with, the police in obtaining evidence prior to an indictment undoubtedly is functioning more in his investigative capacity. . . .") *See also* Imbler, *supra*; Lloyd v. Hines, 474 So.2d 376 (1 D.C.A. Fla., 1985).

[14] *See* Carr v. Bell, 492 F. Supp. 832, 835 (N.D. Fla., 1980); Lloyd, *supra* at 379 (a supervisory official may not be held liable under s. 1983 on a respondeat superior or vicarious liability theory).

[15] *See also* s. 768.28(5), F.S., establishing the monetary limitations of the state's waiver of sovereign immunity at $100,000 for a claim or judgment by one person or $200,000 for all claims or judgments arising out of the same incident or occurrence.

[16] Section 768.28(2), F.S.

[17] *See* Weston, *supra*.

[18] Weston, *supra*, and Berry, *supra* at 84.

[19] Section 768.28(9)(a), F.S. *And see* s. 768.28(3), F.S., providing that an agency or subdivision may request the assistance of the Department of Insurance in the consideration, adjustment, and settlement of any claim under this section.

[20] *And see* s. 111.07, F.S., which states, in part, that:

"Any agency of the state, or any county, municipality, or political subdivision of the state, is authorized to provide an attorney to defend any civil action arising from a complaint for damages or injury suffered as a result of any act or omission of action of any of its officers, employees, or agents for an act or omission arising out of and in the scope of his employment or function, unless, in the case of a tort action, the officer, employee, or agent acted in bad faith, with malicious purpose, or in a manner exhibiting wanton and willful disregard of human rights, safety, or property. Defense of such civil action includes, but is not limited to, any civil rights lawsuit seeking relief personally against the officer, employee, or agent for an act or omission under color of state law, custom, or usage, wherein it is alleged that such officer, employee, or agent has deprived another person of his rights secured under the Federal Constitution or laws."

[21] Sections 284.30-284.42, F.S.

[22] *Id.* at footnote 15.

[23] Section 284.38, F.S.

Municipalities, payment of attorney fees

Number: INFORMAL

Date: April 06, 2009

Mr. Randall Hanson, Esq.
Office of the City Attorney
2345 Providence Boulevard
Deltona, Florida 32725-1806

Dear Mr. Hanson:

Thank you for your letter to Attorney General McCollum requesting comment on a proposed motion relating to the payment of attorney's fees for representing municipal governmental officials. The Attorney General has asked me to respond.

Initially, I must advise you that this office does not comment on the validity of proposed motions or generally on local governmental legislation.[1] The Florida Attorney General is statutorily authorized to provide legal opinions on questions of law relating to state statutory and constitutional provisions.[2] Questions dealing with local legislation or local policy are referred to counsel for the governmental entity and may not be addressed by this office.

A number of Attorney General Opinions have been issued which discuss the payment of attorney's fees for local officials and the circumstances giving rise to requests for reimbursement. You may wish to do additional research on this issue on our website: www.myfloridalegal.com. You may search for relevant Attorney General Opinions using a search term such as "payment of attorney’s fees" or a statutory citation.

However, in an effort to provide you with some direct assistance in this matter, I would note that Florida courts have recognized a common law right of public officials to legal representation at public expense to defend themselves against litigation arising from the performance of their official duties while serving a public purpose.[3] The object of this rule is to avoid the "chilling effect" that a denial of representation might have on a public official in performing his duties properly and diligently.[4] Such an obligation arises independent of statute, ordinance, or charter and "is not subject to the discretion of the keepers of the city coffers."[5]

As the First District Court of Appeal stated in *Ellison v. Reid*,[6]

"There is no doubt a valuable public purpose is served in protecting the effective operation and maintenance of the administration of a public office. If a public officer is charged with misconduct while performing his official duties and while serving a public purpose, the public has a primary interest in such a controversy and should pay the reasonable and necessary legal fees incurred by the public officer in successfully defending against unfounded allegations of official misconduct."

The courts have stated, however, that this obligation arises only when the conduct complained of

arises out of, or in connection with, the performance of the officer' s official duties and while serving a public purpose. For example, in *Chavez v. City of Tampa*,[7] a city council member sought reimbursement from the city for legal expenses she had incurred in successfully defending a charge of unethical conduct before the Florida Commission on Ethics. The charge arose from her vote as a city council member on her petition for an alcoholic beverage zoning classification at business premises she had leased.

While finding that the council member was performing her official duties by voting and thus satisfying the first part of the test, the court determined that her vote did not serve a "public purpose," but rather sought to directly advanced her own private interests. Thus, since both prongs of the test were not met, the city was not required to reimburse the city council member for the legal expenditures she incurred in defending the charges.

The Supreme Court of Florida, in *Thornber v. City of Fort Walton Beach*,[8] reiterated this common law principle. Citing *Chavez v. City of Tampa, supra*, the Court held that in order for public officials to be entitled to representation at public expense, the litigation must:

"1. arise out of or in connection with the performance of their official duties, and
2. serve a public purpose."[9]

If the above test is satisfied, the public official is entitled to reimbursement of attorney's fees in successfully defending his or her actions. The determination as to whether the two-prong test has been met is one that the city commission members must make as the governing body of the municipality.[10]

Finally, I would note that pursuant to Chapter 836, Florida Statutes, libel and other similar offenses are criminal in nature and should be reported to local law enforcement for investigation and possible prosecution.

I trust that these informal comments will be helpful to you in advising your clients.

Sincerely,

Gerry Hammond
Senior Assistant Attorney General

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[1] *See* Statement of Policy Concerning Attorney General Opinions (copy enclosed).

[2] *See* s. 16.01(3), Fla. Stat.

[3] *See, e.g., Markham v. State, Department of Revenue*, 298 So. 2d 210 (Fla. 1st DCA 1974); *Ferrara v. Caves*, 475 So. 2d 1295 (Fla. 4th DCA 1985).

[4] *Nuzum v. Valdes,* 407 So. 2d 277, 279 (Fla. 3d DCA 1981).

[5] *Lomelo v. City of Sunrise*, 423 So. 2d 974 (Fla. 4th DCA 1982), *petition for review dismissed*, 431 So. 2d 988 (Fla. 1983). *And see* s. 111.07, Fla. Stat., which authorizes a state agency, county, municipality, or political subdivision of the state to provide an attorney or pay attorney's fees in a civil action arising from a complaint for damages or injury suffered as a result of any act or omission of action of any of its officers, employees, or agents for an act or omission arising out of and in the scope of his or her employment or function.

[6] 397 So. 2d 352, 354 (Fla. 1st DCA 1981). *And see, Markham v. State, Department of Revenue,* 298 So. 2d 210 (Fla. 1st DCA 1974), stating the general principle that public officers are entitled to a defense at the expense of the public in defending against litigation arising from the performance of official duties and while serving a public purpose.

[7] 560 So. 2d 1214 (Fla. 2d DCA 1990).

[8] 568 So. 2d 914 (Fla. 1990).

[9] In *Thornber*, the officers' legal defense against a recall petition arose out of their alleged malfeasance in meeting in violation of the Sunshine Law and in subsequently voting on the issues at a public meeting. The Court concluded that both prongs of the test had been satisfied, finding that the vote taken at the public meeting fell within their official duties and "[t]he council members' action in defending against the recall petition also served a public purpose." The Court rejected the city's contention that defending against a recall petition only served the elected officials' personal interest in maintaining their positions. While the city had no interest in the outcome of a recall petition, the Court held that the public did have an interest and the city had a responsibility to ensure that the recall petition procedures were properly followed.

[10] *See* Ops. Att'y Gen. Fla. 90-74 (1990) (the determination whether the two pronged test for payment of attorney fees of a public official must initially be made by the governing body of the county based on such factual evidence as the governing body may require; such a determination is beyond the authority of this office); 91-58 (1991); and 85-51 (1985).

Personal liability of supervisor of elections

Number: AGO 89-77

Date: December 17, 1997

Subject:
Personal liability of supervisor of elections

The Honorable Donald L. Hersey
Supervisor of Elections
Putnam County
Post Office Box 977
Palatka, Florida 32078-0977

RE: SUPERVISOR OF ELECTIONS–TORT LIABILITY–DEPUTIES–VOLUNTEERS–SOVEREIGN IMMUNITY–liability of supervisor of elections for conduct of deputy supervisor or volunteers pursuant to s. 98.271, F.S.

Dear Mr. Hersey:

You have asked for my opinion on the following question:

What is the personal liability of a supervisor of elections for the conduct of his or her deputy supervisor of elections or volunteer deputy voter registrars appointed pursuant to s. 98.271, F.S.?

In sum:

Pursuant to Title 42 U.S.C. s. 1983, a supervisor of elections may not be held liable on a theory of *respondeat superior* or vicarious liability for actions of a deputy supervisor of elections or a volunteer deputy voter registrar as they are responsible for their own actions. However, the supervisor may be held liable for his or her own actions in inadequately selecting, training, or supervising such deputies or volunteers if a constitutional violation occurs. The exclusive remedy under s. 768.28, F.S., as amended, for damages resulting from the actions of a deputy supervisor of elections or a volunteer deputy voter registrar would be an action against the supervisor of elections. Such action would be brought against the supervisor of elections in his or her official capacity, not personally, and would not subject the supervisor to personal liability.

Your letter of inquiry contains no indication of a particular problem or concern; therefore, my comments will be general in nature.

Section 98.271, F.S., provides, in part, that:

"(1) Each supervisor of elections shall select and appoint, subject to removal by him, as many deputy supervisors as may be necessary, whose compensation shall be paid by the supervisor of elections and who shall have the same powers and whose acts shall be as effective as the

acts of the supervisor; except that the supervisor of elections shall limit the power to appoint deputy supervisors and volunteer deputy voter registrars to designated deputy supervisors of elections. . . ."

(2)(a) The supervisor of elections may appoint as a volunteer deputy voter registrar, for the purpose of registering voters and accepting changes in registration, any registered elector of the state who resides in or is employed in the county, who seeks such appointment, and who completes a training session . . . ."[1]

Liability under Title 42 U.S.C. s. 1983

Title 42 U.S.C. s. 1983 provides that "every person" who acts under color of state law to deprive another of a constitutional right shall be answerable to that person in a suit for damages.[2] The courts have been reluctant to clothe any person with immunity which would frustrate the statute's design of providing vindication to those wronged by the misuse of state power.[3]

With regard to an action against the supervisor of elections under Title 42 U.S.C. s. 1983 for the actions of a deputy supervisor of elections or volunteer deputy voter registrar, a supervisory official may not be held liable under section 1983 on a *respondeat superior* or vicarious liability theory.[4] However, a supervisor can be held liable for his or her personal actions which may include such things as inadequate selection, training or supervision of his or her deputies or volunteers if a constitutional violation occurs. [5]

In *Lloyd v. Hines*,[6] a recent s. 1983 case before the First District Court of Appeal, the plaintiff/appellant alleged not that the supervisory official, a sheriff, was directly involved in his arrest, imprisonment or prosecution, but that the sheriff was aware of the illegal acts carried out by his deputies. The court held that such an allegation by itself stated a cause of action against the sheriff because actual knowledge of his deputies' unlawful actions was enough to subject the sheriff to s. 1983 liability.

The United States Supreme Court has delineated under what circumstances a municipality may be held liable under s. 1983 for failure to provide training to municipal employees which results in a constitutional deprivation to a third person. In City of Canton, Ohio v. Harris,[7] the Court held that while claims alleging such a failure to provide training are cognizable under s. 1983, liability can only be imposed where the city's failure to train "reflects deliberate indifference to the constitutional rights" of the complainant.[8] It would appear that the same test may be applied to determine the s. 1983 liability of an officer for the failure to train his or her deputies or volunteers if such failure results in a violation of the constitutional rights of a third person.

Thus, pursuant to Title 42 U.S.C. s. 1983, a supervisor of elections may not be held personally liable for the actions of a deputy supervisor of elections or volunteer deputy voter registrar under a vicarious liability theory. However, he or she may be liable for inadequate selection, training, or supervision of these deputies or volunteers pursuant to s. 1983 if a constitutional violation results.

Liability under s. 768.28, F.S.

The Legislature, by enacting s. 768.28, F.S., has waived the State's immunity from tort liability to the extent provided therein. Section 768.28(1), F.S., waives sovereign immunity in tort actions against the state or its agencies or subdivisions to recover money damages for injury or loss of property, personal injury, or death caused by an employee of the agency or subdivision. Such injury or damage must have been sustained while the employee was acting within the scope of his or her office or employment and under circumstances in which the state would be liable if it were a private person.[9]

Limited immunity from civil liability in tort actions for certain officers and employees of the state or its subdivisions is provided by s. 768.28(9)(a), F.S. (1988 Supp.), as follows:

"No officer, employee, or agent of the state or of any of its subdivisions shall be held personally liable in tort or named as a party defendant in any action for any injury or damage suffered as a result of any act, event, or omission of action in the scope of his employment or function, unless such officer, employee, or agent acted in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property. . . . The exclusive remedy for injury or damage suffered as a result of an act, event, or omission of an officer, employee, or agent of the state or any of its subdivisions or constitutional officers shall be by action against the governmental entity, or the head of such entity in his official capacity, or the constitutional officer of which the officer, employee, or agent is an employee, unless such act or omission was committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property. The state or its subdivisions shall not be liable in tort for the acts or omissions of an officer, employee, or agent committed while acting outside the course and scope of his employment or committed in bad faith or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property."

As used in this act, "state agencies or subdivisions" include counties.[10] Thus, no officer, employee, or agent of a county may be held personally liable in a tort action as a result of actions undertaken within the scope of his or her employment or function unless acting in bad faith, or with malicious purpose or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

The exclusive remedy for injury or damage suffered as a result of an act, event, or omission of a deputy supervisor of elections or a volunteer deputy voter registrar is an action against the supervisor of elections, in his or her official capacity.[11] Such an action against a supervisor of elections does not subject the supervisor to *personal* liability but limits recovery to an action against the supervisor in his or her official capacity.[12]

Florida courts have recently been called upon to clarify the concept of governmental tort liability.[13] In addressing this issue The Supreme Court of Florida stated that despite the legislative intent of s. 768.28, F.S., to waive sovereign immunity on a broad basis, certain discretionary governmental functions remain immune from tort liability.[14] In order to identify those functions, the court has distinguished between "planning" and "operational" levels of decision-making by governmental agencies.[15] For use on a case-by-case basis, a test has been adopted for distinguishing between discretionary and other executive or administrative processes:

"(1) Does the challenged act, omission, or decision necessarily involve a basic governmental policy, program, or objective?

(2) Is the questioned act, omission, or decision essential to the realization or accomplishment of that policy, program, or objective as opposed to one which would not change the course or direction of the policy, program, or objective?

(3) Does the act, omission, or decision require the exercise of basic policy evaluation, judgment, and expertise on the part of the governmental agency involved?

(4) Does the governmental agency involved possess the requisite constitutional, statutory, or lawful authority and duty to do or make the challenged act, omission, or decision?"[16]

If all the questions in this test can be answered yes when applied to a particular set of circumstances, then the governmental conduct is discretionary and "nontortious." If one or more questions call for a negative answer, then further inquiry is necessary. This test is intended to assist in distinguishing between the discretionary planning or judgment phase, and the operational phase of government. To subject the government to tort liability for operational phase activities, there must first be either an underlying common law or statutory duty of care in the absence of sovereign immunity. In situations where no common law or statutory duty of care exists for a private person no governmental liability exists.[17]

The Supreme Court of Florida, in Trianon Park Condominium Association, Inc. v. City of Hialeah,[18] placed governmental functions and activities into four categories: (1) legislative, permitting, licensing, and executive officer functions; (2) enforcement of laws and the protection of the public safety; (3) capital improvements and property control operations; and (4) providing professional, education, and general services for the health and welfare of the citizens.[19] The Court stated that:

"In considering governmental tort liability under these four categories, we find that there is no governmental tort liability for the action or inaction of governmental officials or employees in carrying out the discretionary governmental functions described in categories [1 and 2] because there has never been a common law duty of care with respect to these legislative, executive, and police power functions, and the statutory waiver of sovereign immunity did not create a new duty of care. On the other hand, there may be substantial governmental liability under categories [3 and 4]. This result follows because there is a common law duty of care regarding how property is maintained and operated and how professional and general services are performed. . . ."[20]

Activities of the office of the supervisor of elections would appear to fall primarily within categories 1 and 2 of the *Trianon* test. To the extent this is the case, such activities would not subject any governmental officials or agencies to tort liability. This is so because such actions are inherent in the act of governing and the judicial branch has no authority to interfere with the conduct of those functions unless they violate constitutional or statutory provisions.[21] However, to the extent official activities undertaken by officers, employees, or agents of the office of the supervisor of elections fall outside these categories, liability may attach and an action may be brought against the supervisor under s. 768.28, F.S., in his or her official capacity.

Sincerely,

Robert A. Butterworth
Attorney General

RAB/tgh

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[1] Pursuant to s. 98.271(3), F.S., the Division of Elections of the Department of State is to promulgate rules for the appointment, qualification, and training of volunteer deputy voter registrars.

[2] Imbler v. Pachtman, 424 U.S. 409, 417 (1976).

[3] Marrero v. City of Hialeah, 625 F.2d 499, 503 (5th Cir.1980).

[4] *See* Carr v. Bell, 492 F.Supp. 832, 835 (N.D. Fla., 1980); Lloyd v. Hines, 474 So.2d 376, 379 (1 D.C.A. Fla., 1985) (a supervisory official may not be held liable under s. 1983 on a *respondeat superior* or vicarious liability theory.)

[5] *Id.*

[6] *Id.* at note 4.

[7] 109 S.Ct. 1197 (1989).

[8] *Id.* at 1206.

[9] *See also* s. 768.28(5), F.S. (1988 Supp.), establishing the monetary limitations of the state's waiver of sovereign immunity at $100,000 for a claim or judgment by one person or $200,000 for all claims or judgments arising out of the same incident or occurrence.

[10] Section 768.28(2), F.S., as amended by s. 55, Ch. 89-300, Laws of Florida.

[11] Section 768.28(9)(a), F.S. (1988 Supp.). *And see* s. 768.28(3), F.S., as amended by s. 55, Ch. 89-300, Laws of Florida, providing that an agency or subdivision may request the assistance of the Department of Insurance in the consideration, adjustment, and settlement of any claim under this section.

[12] *And see* s. 111.07, F.S., which states, in part, that:

"Any agency of the state, or any county, municipality, or political subdivision of the state, is authorized to provide an attorney to defend any civil action arising from a complaint for damages or injury suffered as a result of any act or omission of action of any of its officers, employees, or agents for an act or omission arising out of and in the scope of his employment or function, unless, in the case of a tort action, the officer, employee, or agent acted in bad faith, with

malicious purpose, or in a manner exhibiting wanton and willful disregard of human rights, safety, or property. Defense of such civil action includes, but is not limited to, any civil rights lawsuit seeking relief personally against the officer, employee, or agent for an act or omission under color of state law, custom, or usage, wherein it is alleged that such officer, employee, or agent has deprived another person of his rights secured under the Federal Constitution or laws. . . ."

[13] *See* Commercial Carrier Corporation v. Indian River County, 371 So.2d 1010 (Fla. 1979), and Trianon Park Condominium Association, Inc. v. City of Hialeah, 468 So.2d 912 (Fla. 1985).

[14] 371 So.2d at 1022; 468 So.2d at 918.

[15] *Id.*

[16] 468 So.2d at 918.

[17] *Id.* at 918-919.

[18] 468 So.2d 912 (Fla. 1985).

[19] *Id.* at 919.

[20] *Id.* at 921.

[21] *Id.* at 919.

Pretermination hearing

Number: AGO 77-37

Date: January 26, 1998

Subject:
Pretermination hearing

CAREER SERVICE SYSTEM--WHEN EMPLOYEES MAY BE REIMBURSED LEGAL FEES IN PROCEEDINGS RELATING TO TERMINATION

To: Jack D. Kane, Executive Director, Department of General Services, Tallahassee

Prepared by: Betty Steffens, Assistant Attorney General

QUESTIONS:

1. What status is to be accorded a hearing for state career service employees held before the Governor and Cabinet sitting as the head of a state agency to determine if just cause for dismissal existed?

2. Would legal fees incurred by employees for such a hearing be reimbursable under provisions of Ch. 110, F. S.?

SUMMARY:

Legal fees incurred by career service employees at pretermination hearing before an agency head are not reimbursable under s. 110.061(3), F. S.; only the Career Service Commission may award legal costs to state career service employees and only if incurred during the prosecution of an appeal against a state agency conducted before the commission.

A special subcommittee of the House Appropriations Committee transmitted to Governor Askew a resolution that stated that the committee failed to find confidence in, among others, two permanent career service employees of the Department of General Services. The Governor directed that the matter be presented, at a special hearing, to the Governor and Cabinet who, sitting as the head of the Department of General Services, considered the report of the special subcommittee over a period of several days. The purpose of the hearing was to determine whether the permanent career service employees should be dismissed.

The hearing before the Governor and Cabinet sitting as the head of the Department of General Services to determine if "cause" existed for dismissal of career service employees took place *prior* to any disciplinary action by the agency and as such constituted a pretermination hearing. Chapter 110, F. S., governing the Career Service System, and companion personnel rules and regulations, Ch. 22A, F.A.C., do not provide for pretermination hearings within the Career Service System. Such hearings are, for purposes of Ch. 110, discretionary with the agency. Thus, the hearing before the Governor and Cabinet sitting as the head of the Department of General Services to determine whether "cause" existed for dismissal of career service agency

employees is not a proceeding specifically within the parameters of the State Career Service System. Your first question is answered accordingly.

In answer to your second question concerning recoupment of legal expenses incurred by career service employees at a pretermination hearing before an agency head, I must refer to the direct statutory provision. Section 110.061(3), F. S., grants the Career Service Commission power to award ". . . reasonable attorney's fees, witness fees, and other out-of-pocket expenses incurred during the prosecution of appeal against an agency in which the commission sustains the employee." Under this provision *only* the Career Service Commission may award legal costs and *only* if incurred during an appeal against the affected agency before the commission. Thus, legal costs incurred by career service employees in pretermination hearings before an agency head other than the Career Service Commission are not reimbursable under s. 110.061(3).

The issue of attorney's fees in postcommission proceedings was addressed by the court in Board of Regents v. Mahler, 321 So.2d 99 (1 D.C.A. Fla., 1975). Upon examination of s. 110.061(3), F. S., the court denied attorney's fees and stated, at p. 100:

"It is settled law that attorney's fees under such circumstances may not be awarded unless provided by statute or contract. This issue, therefore, to be by us resolved is whether F. S. 110.061(3) authorizes the award of attorney's fees incurred during the prosecution of a proceedings in this Court or whether same only authorizes such fees incident to procedures before the Career Service Commission. Our reading of the above quoted statute leads us to the inescapable conclusion that the statute by its very own terms *relates only to proceedings before the Career Service Commission*. Proceedings subsequent to the disposition of a cause by the Career Service Commission are neither mentioned nor alluded to. There is no language in the statutes which we find may be construed to be applicable to post-commission proceedings." (Emphasis supplied.)

I believe the same rationale used by the court in dealing with attorney's fees incurred in postcommission proceedings can be applied to precommission proceedings such as outlined in your letter. *Cf.* AGO 075-152. Thus, I must conclude that neither the Department of General Services nor the Governor and Cabinet sitting as its agency head is authorized by Ch. 110, F. S., to award legal costs or expenses to state employees in the circumstances implicit in your questions. Authorization for the department to expend funds for reimbursement of legal fees would have to be found under some other statute. *Cf.* ss. 111.07 and 111.08.

Public official, reimbursement of attorney fees

Number: INFORMAL

Date: December 04, 2017

Ms. Alison P. Rogers
Escambia County Attorney
221 Palafox Place, Suite 430
Pensacola, Florida 32502

Dear Ms. Rogers:

On behalf of the Escambia County Board of County Commissioners ("Board"), you have requested an opinion addressing the following question:

Whether the Board may legally determine under the common law that a sitting Commissioner is entitled to legal representation at public expense to defend himself against a second defamation action brought by a former Commissioner where the alleged defamatory statements were made prior to the Commissioner's candidacy and current term of office, but the alleged statements were not [posted on Facebook] until after the Commissioner was elected?[1]

You have confirmed that the Commissioner's request has been made in connection with a lawsuit filed by a former commissioner ("Plaintiff"), who is suing a present commissioner ("Commissioner") and an additional defendant ("Defendant"), each described in the complaint as "a natural person residing in Escambia County, Florida."[2] Your letter to this office reflects that the Commissioner making the request was elected in November of 2014. Attorney General Bondi has asked me to respond to your request.

In his complaint, the Plaintiff (a former political opponent of the Commissioner) alleges that Defendant, "on behalf of himself and [the Commissioner]," posted allegedly "defamatory material" on Facebook, consisting of emails purportedly exchanged (and therefore first "published")[3] between the Defendant and the Commissioner from November 6, 2013 through September 28, 2014. The Plaintiff continues:

"7. ...In pertinent part, those materials accuse the Plaintiff of engaging in affairs and marital infidelities.

8. The publication of these statements were *(sic)* intended to cause *(sic)* aspersions upon the Plaintiff's conduct and character.

9. The statements made by the Defendants…and the implications contained therein, are false, malicious (in law and fact), and defamatory.

10. The statements published by the Defendants were done so *(sic)* in complete disregard of their obviously harmful effect on the Plaintiff's reputation and good-standing in the community."

As a threshold matter, although you have asked about the Commissioner's entitlement to "legal

representation at public expense to defend himself" against this lawsuit, you have not asked about the applicability of section 111.07, Florida Statutes ("Defense of civil actions against public officers, employees, or agents"). It provides that "any county…is authorized to provide an attorney to defend any civil action arising from a complaint for damages or injury suffered as a result of any act or omission of action of any of its officers, employees, or agents for an act or omission arising out of and in the scope of his or her employment or function[.]" Because, in this case, the alleged statements on which the lawsuit is predicated were made before the Commissioner became a county officer, section 111.07 would not, on its face, appear to apply.

But even where the statute does not apply, a public official may, under certain circumstances, be entitled to reimbursement under the common law for attorney's fees incurred in a civil suit based on his or her challenged official actions. *See generally Thornber v. City of Ft. Walton Beach*, 568 So. 2d 914, 916 (Fla. 1990) ("In this case, however, our inquiry does not end at whether the council members are entitled to recover fees under section 111.07."). In every case where reimbursement is sought relying on the common law principle regarding reimbursement of fees for public officials who "successfully [defend] against unfounded allegations of official misconduct," however, the doctrine may only be applied consistent with the basic tenet of Florida law that the expenditure of public funds must be used primarily for a public, and not a private, purpose.[4] Thus, an official seeking payment of public funds to reimburse him or her for attorney's fees incurred must establish entitlement to this common law exception, demonstrating that the official's claim is consistent with the justification underlying it.

That justification was clearly articulated in *Thornber*. There, the Florida Supreme Court observed that the "purpose of this common law rule is to avoid the chilling effect that a denial of representation might have on public officials in *performing their duties properly and diligently*." 568 So. 2d at 917 (Emphasis added). "To deny a public official representation for acts *purportedly arising from the performance of his official duties* would have a chilling effect upon the proper performance of his duties and the diligent representation of the public interest." *Nuzum v. Valdes*, 407 So. 2d 277, 279 (Fla. 3d DCA 1981) (Emphasis added).

However, as later stated in *Maloy v. Bd. of Cty. Comm'rs of Leon Cty.*, 946 So. 2d 1260, 1262 (Fla. 1st DCA 2007), "[u]nder *Thornber*, a public official is not entitled to taxpayer funded representation simply because an allegation of misconduct arises in the course of his public duties":

"Rather, the context out of which the alleged misconduct arose must also serve a public purpose. In *Ellison*, a property appraiser's participation in a training seminar served a public purpose. In *Lomelo* [*v. City of Sunrise*, 423 So. 2d 974, 976 (Fla. 4th DCA 1982)], a mayor's use of his authorized power to release an arrestee served a public purpose. In *Chavez*, a city council member's vote, although part of her official duties, served only her private financial interests and not a public purpose."

Id. at 1265.

Consistent with these principles, a framework for analysis has emerged from the cases (decided both before and after *Thornber*) in which the common law doctrine has been examined. Under this framework, the relevant questions are: 1. Was the official's successful defense against the

charges undisputed?[5] 2. Did the challenged acts arise out of the official's performance of public duties and serve a public purpose?[6] 3. Is the substance of the litigation of interest to the administration of the business of the prospective payor (here, Escambia County)?[7] 4. Did the prospective payor (here, Escambia County) authorize the challenged acts?[8]

Ultimately, the Commission must make the decision, based on the factual evidence before it, regarding whether the circumstances applicable to the Commissioner's request satisfy the common law prerequisites for reimbursement. Hopefully, however, the informal comments provided herein will assist you in advising your client.

From the facts presented, it appears that the crux of the complaint against the Commissioner is that, prior to the time he was elected to county office, the Commissioner sent emails to a person other than the Plaintiff that allegedly contained "false, malicious (in law and fact), and defamatory" statements "intended to [cast] aspersions on the Plaintiff's conduct and character." After the Commissioner was elected to county office, the person to whom the emails were sent, allegedly "on behalf of himself and [the Commissioner]," posted the emails on Facebook. Using these allegations (whose truth, falsity, or legal sufficiency has not yet been judicially determined) as the context for the Commission's analysis, the following questions arise:

§ Has the matter been successfully concluded?

No. The Commissioner seeks to have Escambia County (the "County") provide his legal defense in the pending litigation.

§ Did the challenged acts arise out of the official's performance of public duties?

No. You have referenced no legal authority—and I have found none—that imposed a public duty on the commissioner to send emails which allegedly cast "aspersions" on a former political opponent by purportedly accusing him of "engaging in affairs and marital infidelities." Unlike the allegedly defamatory statements of the mayor in *Duplig*—made in his official capacity and in the course of bringing to the council's attention information concerning the conduct of officials serving at the pleasure of the council[9]—here, the predicate acts (writing the emails) occurred *prior* to the time the Commissioner was elected to county office, and served no official function. Their subsequent posting on Facebook does not make the ensuing litigation "arise" out of the Commissioner's performance of public duties. *Cf. Markham*, 298 So. 2d at 214 (rejecting an argument that, "although the election contest was personal prior to his assuming office,…it thereupon acquired a public purpose.").

§ Did the challenged acts serve a public purpose?

No. You have referenced no legal authority—and I have found none—that reflects that sending, or posting on social media, emails which allegedly cast "aspersions" on a former political opponent by purportedly accusing him of "engaging in affairs and marital infidelities" furthers a "public purpose." *Cf. Maloy*, 946 So. 2d at 1265 ("[A] public official's sexual conduct, whether in the form of illicit sexual harassment or consensual relations between adults, and whether occurring inside or outside of the workplace, does not serve a public function."); *Chavez*, 560 So. 2d at 1218 ("From our study of the intent and policy of the legislature in the context of ethical

behavior, we think ‘public purpose’ equates with ‘public interest’ and excludes any taint of ‘private interest.’”).

§ Is the substance of the litigation of interest to the administration of the business of the potential payor (here, the County)?

No. In your letter, you state that the Plaintiff had previously filed a defamation action against the Commissioner “in his personal capacity,” and that such action “was ultimately dismissed with prejudice after the trial court concluded the statements were not actionable[.]” You indicate that, in connection with the Commissioner’s request regarding the Plaintiff’s second suit based on alleged defamation, the Commission has “questioned whether the pattern or practice of litigiousness by a former political opponent against an elected official may be relevant under the *Thornber* analysis.”

However, you have referenced no legal authority—and I have found none—that would support a conclusion that the litigiousness of the Plaintiff is a relevant consideration. Instead, courts have examined whether the gravamen *of the matter alleged* in the complaint implicates the proper administration of the local government from whom reimbursement is sought.[10] Because the complaint in this case challenges allegedly defamatory statements pertaining to a former political opponent made by a Commissioner prior to his election and in his personal capacity (albeit posted on Facebook after the Commissioner’s election to office), the business of the County does not appear to be implicated.

§ Did the potential payor (here, the County) authorize the challenged acts?

No. Relevant to this question, on August 20, 2009,[11] the County Commissioners' Technology Policy was adopted.[12] It provides, in pertinent part, as follows:

“A. Purpose:

* * *

New Policy

The purpose of this policy is to *establish rules for how the County Commissioners use technology to communicate to ensure they conduct themselves in a responsible, professional, ethical and efficient manner, with an eye towards the public's perception of their elected officials and how they conduct business*. Improvements and evolutions in technology are occurring so rapidly that it is difficult for the laws and rules that govern County business and elected officials to keep pace. The Florida Sunshine Law and Public Records Law pose special challenges to the County Commissioners who should follow not just the letter of those laws, but also their intent. It is vital to the credibility of Escambia County government that the public perceive their Commissioners are respectful of those laws and of the citizens they govern.

B. Policy:

1. Applicability: *This policy is intended as an additional layer of control over the County*

Commissioners' use of technological resources, regardless of the ownership of those resources. This policy is intended to supplement any existing policy, rule or law that applies to the County Commissioners or to County-owned resources.

* * *

3. Electronic Mail (E-Mail): In order to ensure compliance with Florida's Public Records' Law, including record retention requirements, Commissioners *shall not use private e-mail accounts to conduct County business*. Private e-mail accounts include outside business e-mail accounts, personal accounts and any other e-mail account that does not operate through Escambia County's server. However, should a Commissioner receive e-mail in a private e-mail account, the Commissioner *shall forward the e-mail to a County-maintained email account* and shall request that the author of the original e-mail use the County-maintained e-mail account for future communications. Such actions shall not be a violation of this policy.

* * *

5. Social Networking Accounts, Twitter, Story Forum Comments, Blogs and Similar Communications: *Commissioners shall not discuss County business on social networking sites, including, but not limited to, Facebook and Twitter, and shall not blog or otherwise communicate on the internet about County business other than via e-mail as provided above* and in other applicable laws and regulations.

However, a commissioner may post a story forum comment or response on a blog on a site maintained by another person or media outlet regarding County business so long as the commissioner posts the comment or response using the commissioner's actual name and the commissioner does not post a comment or response when another commissioner has already posted on that specific article or issue. *A copy of any such posting shall be retained by the County*.

* * *

C. Enforcement:

A majority of the County Commission may take any available enforcement action against a fellow Commissioner found to be in violation of this policy. *Additionally, the County shall not be responsible for any costs resulting from a Commissioner's failure to follow this policy. Such costs are to include, but not be limited to*, text messaging charges and *attorney's fees, unless specifically allowed by State law*. All other applicable laws, rules and policies may have other enforcement mechanisms that could apply. County Commissioners are responsible for compliance with the Sunshine Law and Public Records' Law at all times during their term."

(Emphasis added).

As analyzed above, the challenged emails allegedly authored by the Commissioner before he was elected, sent by private email to a third party, and subsequently posted on Facebook involve allegedly defamatory statements made about a former political opponent prior to the

Commissioner's assumption of any County duties. Therefore, such emails would not appear to pertain to "County business."

However, any argument that these actions *do* implicate the County's business would also lead to a conclusion that the sending and posting of such emails would appear to violate various provisions of the County Commissioners' Technology Policy. Rather than being authorized by the potential payor (the County), such actions (if done by a sitting Commissioner) would appear, when compared to the County's technology policy, to have been prohibited by it.

Based on the foregoing, although the Commission must ultimately decide whether it can legally authorize the use of County funds to reimburse the Commissioner for attorney's fees incurred in his defense against the subject defamation action, from the facts alleged in the complaint and providing the context in which the subject litigation has arisen, none of the *Thornber* factors authorizing payment of such fees at taxpayer expense facially appear to be met in this case. I trust that these informal observations will assist you in advising the Commission regarding its potential actions.

Sincerely,

Teresa L. Mussetto
Senior Assistant Attorney General

TLM/tsh

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[1] In phrasing your question, you used the word "published," apparently intending its common meaning. Because the word "published" is a legal term of art as it pertains to allegations of slander or libel (*see* note 2, *infra*), the factual phrase "posted on Facebook" has been substituted here.

[2] *See generally Duplig v. City of S. Daytona*, 195 So. 2d 581, 584 (Fla. 1st DCA 1967) (reflecting that the first step in deciding whether the City could pay for the mayor's defense in an action for defamation filed against him was to review the allegations of the complaint to determine whether the mayor had been sued in his individual or official capacity).

[3] *See* Restatement (Second) of Torts, § 577 ("Publication of defamatory matter is its communication intentionally or by a negligent act to one other than the person defamed.") (quoted in *Doe v. Am. Online, Inc.*, 783 So. 2d 1010, 1016 (Fla. 2001)).

[4] *See* Art. VII, § 1, Fla. Const.

[5] *See, e.g., Maloy*, 946 So. 2d at 1262 (reflecting that Commissioner Maloy, in defending against an ethics complaint alleging sexual misconduct involving female staff members, had "prevailed in all respects"); *Chavez v. City of Tampa*, 560 So. 2d 1214, 1215–16 (Fla. 2d DCA 1990) (reflecting that the ethics complaint against Commissioner Chavez had been dismissed based on the hearing officer's conclusion that her challenged vote—used to break an impasse with respect to an "alcoholic beverage zoning classification permitting…liquor sales at premises she had recently leased"—was merely "procedural and not a vote on the substance of the

ordinance itself"); *Ellison v. Reid*, 397 So. 2d 352, 354 (Fla. 1st DCA 1981) (reflecting the Ethics Commission's findings that Reid "committed no act of wrongdoing"); *Estes v. City of N. Miami Beach*, 227 So. 2d 33, 33–34 (Fla. 1969) (reflecting that the complaint filed by a losing candidate for councilman against four of seven members of the city council, charging election law violations and seeking to enjoin the councilmen from performing certain duties pending outcome of the suit, "was successfully defended by the special counsel").

[6] *Compare Maloy*, 946 So. 2d at 1265 ("Although cleared of the alleged misconduct, Maloy's underlying activity did not serve the public interest[.]"), Chavez, 560 So. 2d at 1218 ("The appellant's admission that there was a private interest present underlying her vote is inconsistent with, and cannot equate to, the 'public purpose' requirement in the second prong of the common law test. Thus, because she voted for her private interest, there is no support for the award of fees and costs under common law principles."), *and Markham v. State, Dep't of Revenue*, 298 So. 2d 210, 212 (Fla. 1st DCA 1974) ("The suit giving rise to the incurring of the attorney's fees was not against the appellant in his official capacity nor did it arise from a discharge of his official duties nor serve a public purpose. The suit was a pure and simple election contest relating to the validity of certain absentee votes.") *with Ellison*, 397 So. 2d at 354 (reflecting that Reid was entitled to attorney's fees where the activity for which the Ethics Commission had exonerated him—involving allegations that he had improperly given examination papers to his employees while attending a training program—involved the public purpose of attending training intended to enable him [as the property appraiser] and his staff to become better educated and skilled in their official responsibilities).

[7] *Compare Estes*, 227 So. 2d at 35 ("The granting of an injunction in the Weithorn case would prevent the city from continuing the operation of its business affairs during the pendency of the litigation as the injunction would have enjoined four of the seven councilmen. The three councilmen not involved could perform no functions for the city.… Being concerned about the chaotic condition which might ensue and being confronted with the effect of such an injunction on the public welfare and property of the municipality, it was not an abuse of discretion for the city council to determine that the city had an interest which would be affected by the outcome of the proceedings.") *and Duplig*, 195 So. 2d 581 (reflecting that the city had a pecuniary interest in seeing that the mayor brought to the council's attention information concerning the conduct of officials serving at the pleasure of the council, and therefore had an interest in the outcome of a defamation suit brought by a former city clerk against the mayor based on allegedly defamatory statements he had made to the council concerning the city clerk, where there was no "allegation in the complaint 'that the actions complained of were performed by the Mayor in his personal capacity with bad faith'") *with Peck v. Spencer*, 26 Fla. 23, 7 So. 642, 644 (1890) ("And now, admitting the right of corporations to sue and to defend suits, and to protect their officers in the lawful discharge of their duties, to be correct, still, where did the town council of Daytona derive their powers to appropriate money in the defense of contested elections in the result of which the corporation had no pecuniary interest whatever? Such power is not given in its charter, either expressly or by reasonable implication. These contests are personal, and the corporation can have no interest in the result, and an appropriation to pay any one of the parties the expenses he may be put to is without legal authority.") *and Markham*, 298 So. 2d at 214 ("Appellant claims that although the election contest was personal prior to his assuming office, that it thereupon acquired a public purpose. In the *Peck* case the defendant was acting mayor while he was defending the suit and was thus a public official, but that fact did not make the suit any less

personal.…In conclusion, we hold that an election contest between opposing candidates for an office, arising out of a challenge directed to specific votes sufficient in number to change the result of the election, is personal between the candidates and litigants and is not an official duty of the candidate holding the office and serves no public purpose justifying the expenditure of public funds incident thereto.").

[8] *See Maloy*, 946 So. 2d at 1264–65 (observing that, in *Lomelo v. City of Sunrise*, 423 So. 2d 974, 976 (Fla. 4th DCA 1982), the subject official, who "was found innocent" of charges of threatening an officer or his family, had "obtained an arrestee's release by virtue of his power as mayor granted in the city charter. Thus he clearly acted in his official capacity and such actions were authorized by the public body.").

[9] *See Duplig*, 195 So. 2d at 581.

[10] *Compare Thornber*, 568 So. 2d at 917 ("The city does not have an interest in the outcome of a recall petition because any individual, not any specific individual, can be the officeholder at issue....It does have a decided interest, however, in protecting its officers from untimely and illegal recall petitions."), *Miller v. Carbonelli*, 80 So. 2d 909 (Fla. 1955) ("In this situation the council was thoroughly justified in expending public funds to insure that the action they had taken in the choice of a mayor was properly defended, and consequently to dispel any doubt about the exercise by Cudlipp of the prerogatives of the office of mayor."), *Estes*, 227 So. 2d at 35 ("The granting of an injunction in the Weithorn case would prevent the city from continuing the operation of its business affairs during the pendency of the litigation as the injunction would have enjoined four of the seven councilmen."), *and Duplig*, 195 So. 2d at 584 ("In the case at bar, however, we think that the Town of South Daytona had a pecuniary interest in seeing that its chief executive officer, the Mayor, brought to the attention of the Town Council information concerning the conduct, loyalty, and efficiency of officials serving at the pleasure of the Council.") *with Peck*, 7 So. at 644 ("[W]here did the town council of Daytona derive their powers to appropriate money in the defense of contested elections in the result of which the corporation had no pecuniary interest whatever?…These contests are personal, and the corporation can have no interest in the result, and an appropriation to pay any one of the parties the expenses he may be put to is without legal authority."), *Williams v. City of Miami*, 42 So. 2d 582 (Fla. 1949) ("[The City of Miami] was not interested in the result of the recall election, but such interest was personal to and the law required that the costs should be paid by appellant and not by the taxpayers of the City of Miami."), *and Markham*, 298 So. 2d at 214 ("Appellant claims that although the election contest was personal prior to his assuming office, that it thereupon acquired a public purpose.…[W]e hold that an election contest between opposing candidates for an office…is personal between the candidates and litigants and is not an official duty of the candidate holding the office and serves no public purpose justifying the expenditure of public funds incident thereto.").

[11] This adoption date predates the operative dates of the facts alleged in the complaint involved here.

[12] At our request, you provided this office with a copy of the County's technology policy.

South Broward Hospital District - Public Records

Number: AGO 2016-16

Date: October 06, 2016

Subject:
South Broward Hospital District - Public Records

Ms. Kimarie Stratos
General Counsel
Memorial Healthcare System
South Broward Hospital District
3111 Stirling Road
Fort Lauderdale, Florida 33312

RE: SOUTH BROWARD HOSPITAL DISTRICT – PUBLIC RECORDS – ATTORNEY'S FEES – PUBLIC FUNDS – authority of district to reimburse attorney's fees to individual commissioner retaining private counsel to respond to public record request. ss. 119.07 and 286.011, Fla. Stat.

Dear Ms. Stratos:

As general counsel to the South Broward Hospital District, you submit substantially the following question:

May the district reimburse a board member's attorney's fees incurred by her in responding to a public records request pertaining to her board service when no suit, claim, charge, or action has been instituted against the commissioner during the time the attorney's fees were incurred?

In sum:

The South Broward Hospital District is not authorized to reimburse a board member for attorney's fees incurred by her in responding to a public records request when no suit, claim, charge or action has been instituted against the commissioner during the time the attorney's fees were incurred.

You have provided the following background. The South Broward Hospital District (hospital district) was conducting a search for a new chief operating officer. A public records request was made of all commissioners in relation to the search. Allegations of violation of section 286.011, Florida Statutes (Government in the Sunshine Law) were made, but no legal action was filed, and the subject commissioner retained private counsel to assist in her response to the public records request. The district did not provide a district email address or phone for individual commissioners to conduct district business such that the commissioner's private computer and telephone records had to be reviewed to recover the requested public records. Due to her concerns about the independence of the district's counsel, the commissioner was unwilling to turn over all of her records to the district's counsel for review or to make use of the district's information technology staff who were made available to all commissioners to extract and copy

responsive material from their individual devices. At no point were any legal charges filed against the commissioner.

Section 286.011(7), Florida Statutes, provides:

“Whenever any member of any board or commission of any state agency or authority or any agency or authority of any county, municipal corporation, or political subdivision is charged with a violation of this section and is subsequently acquitted, the board or commission is authorized to reimburse said member for any portion of his or her reasonable attorney’s fees.”

While the language in section 286.011(7), Florida Statutes, is clear in the parameters which must be met before a member of a board may be reimbursed for his or her attorney’s fees in successfully defending a charge of violation of the Government in the Sunshine Law, the facts in this situation are that no legal action has been filed against the commissioner and she retained private counsel in order to respond to a public records request.[1] The authority extended by section 286.011(7), Florida Statutes, to reimburse attorney’s fees, therefore, is not applicable.

Chapter 2004-397, Laws of Florida, is the enabling legislation for the South Broward Hospital District. The act sets forth the broad powers of the district’s governing board to carry out the district’s purpose of providing health care services.[2] The commissioners are required to

“cause true and accurate minutes and records to be kept of all business transacted by them, and shall keep full, true, and complete books of account and minutes, which minutes, records, and books of account shall at all reasonable times be open and subject to the inspection of inhabitants of the district; and any person desiring to do so may make or procure a copy of the minutes, records, or books of account, or such portions thereof as he may desire.”[3]

There is no question that all records of the district are public records, subject to inspection and copying by anyone requesting same, unless exempted or made confidential by law.[4] While there is provision for the recovery of attorney’s fees when a plaintiff files a civil action against an agency to enforce the provisions of this chapter and the court determines that such agency unlawfully refused to permit a public record to be inspected or copied,[5] there is no provision similar to that found in section 286.011(7), Florida Statutes, nor is there authority for the reimbursement of attorney’s fees to a public official who has hired a private attorney to assist in the production of public records.

As an administrative agency created by statute, the South Broward Hospital District is constrained to exercise those powers expressly granted or by implication necessary to carry out the express authority granted them by statute.[6] Any reasonable doubt as to the lawful existence of a particular power sought to be exercised must be resolved against the exercise thereof.[7]

Therefore, it is my opinion that the South Broward Hospital District is not authorized to reimburse a board member for attorney’s fees incurred by her in responding to a public records request when no suit, claim, charge, or action has been instituted against the commissioner during the time the attorney’s fees were incurred.

Sincerely,

Pam Bondi
Attorney General

PB/tals

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[1] *See also* s. 111.07, Fla. Stat., authorizing any agency of the state, or any county, municipality, or political subdivision of the state to provide an attorney to defend any civil action arising from a complaint for damages or injury suffered as a result of any act or omission of any of its officers, employees, or agents for an act or omission arising out of and in the scope of his or her employment or function, unless, in the case of a tort action, the officer, employee, or agent acted in bad faith, with malicious purpose, or in a manner exhibiting wanton and willful disregard of human rights, safety, or property.

[2] *See* s. 4, Ch. 2004-397, Laws of Fla.

[3] Section 5, Ch. 2004-397, Laws of Fla.

[4] *See* s. 119.07(1), Fla. Stat.

[5] *See* s. 119.12, Fla. Stat.

[6] *See State ex rel. Greenberg v. Fla. State Bd. of Dentistry*, 297 So. 2d 628, 634 (Fla. 1st DCA 1974) (administrative agencies are creatures of statute and have only such powers as statutes confer); *Fiat Motors of North America, Inc. v. Calvin*, 356 So. 2d 908, 909 (Fla. 1st DCA 1978).

[7] *See, e.g., Gardinier, Inc. v. Fla. Dep't of Pollution Control*, 300 So. 2d 75, 76 (Fla. 1st DCA 1974); *Williams v. Fla. Real Estate Comm'n*, 232 So. 2d 239, 240 (Fla. 4th DCA 1970).

Use of funds to pay attorney fees

Number: AGO 80-19

Date: January 15, 1998

Subject:
Use of funds to pay attorney fees

PUBLIC FUNDS--EXPENDITURE NOT AUTHORIZED FOR LEGAL EXPENSES OF FORMER HOUSING AUTHORITY MEMBER CONTESTING HIS REMOVAL FROM OFFICE

To: Robert H. Levison, Chairman, Clearwater Housing Authority, Clearwater

Prepared by: Percy W. Mallison, Jr., Assistant Attorney General

QUESTION:

May the Clearwater Housing Authority expend public moneys to pay the attorney's fees of a former commissioner of the housing authority who "appeals" his removal from office by the mayor under the provisions of s. 421.07, F. S.?

SUMMARY:

The Clearwater Housing Authority is not empowered by law to expend public moneys to hire an attorney to represent a former member of the housing authority to seek judicial review of his removal from office or to anywise contest his removal from office.

According to your letter, the Mayor of Clearwater recently charged a member of the Clearwater Housing Authority with "neglect of duty and misconduct in office" for allegedly having violated a provision of the Florida Public Records Law, Ch. 119, F. S. Pursuant to the provisions of s. 421.07, F. S., the mayor requested the Clearwater City Commission to concur in his recommendation to remove said member of the housing authority from office. The commission did concur in the mayor's recommendation, and the member of the housing authority was removed from office. It now appears that this former commissioner of the Clearwater Housing Authority contemplates an "appeal" of removal by filing an action in circuit court. These facts have precipitated your question which concerns the ability of the housing authority to expend public moneys to hire an attorney to represent this former member of the authority on such "appeal."

As stated in s. 421.02, F. S., the Legislature has found that there exists in Florida an insufficient number of safe and sanitary dwelling units available at rents affordable to persons of low income. Furthermore, the Legislature found that private enterprise is not properly suited to completely alleviate this shortage. Consequently, s. 421.04, F. S., establishes in each city in the state a public body corporate and politic to be known as the "housing authority" of that city. Such a housing authority, however, is not authorized to exercise any power or transact any business unless or until the governing body of the city passes a resolution declaring a need for the

authority to function. Once the city has declared the need for activating its authority, the mayor, with the approval of the city's governing body, is given the power to appoint five persons to serve as commissioners of the authority with terms of office of 4 years each. In addition, s. 421.07, F. S., empowers the appointing authorities to remove a commissioner of an authority for inefficiency or neglect of duty or misconduct in office. I assume that the Clearwater Housing Authority was properly activated and that its commissioners have been legally appointed. I must also note that this opinion should not be read and is not intended to pass on the propriety, legality, or efficacy of the actions of the Mayor and the City Commission of the City of Clearwater in removing from office the housing authority commissioner in question.

It should be clear from the above discussion of Ch. 421, F. S., that housing authorities are established by and are creatures of the Legislature. As such they have only those powers expressly granted by law or necessarily implied as essential to carry out those duties imposed by law. *See* AGO 078-104 and the cases cited therein; and *cf.* State Department of Citrus v. Huff, 290 So.2d 130 (2 D.C.A. Fla., 1974). In this regard, I can find no express provision in Ch. 421 requiring or permitting the Clearwater Housing Authority to pay the legal expenses incurred by a former member of the authority in "appealing" his removal from that body. In fact, s. 421.07 makes no provision for any such "appeal" or for any judicial review of the acts of the mayor and the city commission in removing a commissioner from office. Neither have I found nor have I been cited to any other provision of law which permits or requires the authority to incur such obligations. *Compare* ss. 111.07, 111.071, and 112.44, F. S., which permit the payment of attorney's fees or the provision of an attorney in certain factual situations not present here. Furthermore, I cannot say that paying the legal expenses of a *former* member of the authority can be implied in any way as necessary to carry out the duties and responsibilities of the authority. As I mentioned above, the statute itself makes no provision for such an "appeal," and this fact makes it even more difficult to argue that the expenditure of public funds to pursue such a course of action would be a necessary incident to those powers and duties specifically conferred and imposed. Once a commissioner has been removed from office pursuant to the provisions of s. 421.07, any action he might take to contest his removal would benefit no one but himself. *Cf.* AGO's 069-40, 072-86, 074-124, and 078-97. A housing authority may expend public moneys only to carry out the *public* purposes for which it was established. Absent express statutory authority therefor, I have grave doubts that paying the legal expenses and attorney's fees of a former member of the housing authority to seek review of his removal from office or to anywise contest his removal would constitute such a public purpose.

Tab Y - Judicial Ethics Benchguide: Canon 3E disqualification standards

JUDICIAL ETHICS BENCHGUIDE:

ANSWERS TO FREQUENTLY ASKED QUESTIONS

November 2018

A Project of the Florida Court Education Council's Publications Committee

ABOUT THE AUTHOR

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Judicial Ethics Benchguide November 2018 Update

The *Judicial Ethics Benchguide* has been updated. The updates are shown below, along with the chapter, section, and page number where they are located.

Introduction

3. How is Code Enforced?

Page xxvi

Only ~~20~~22 judges have been removed from office for improper conduct. *See In re Santino*, __ So. 3d __, 2018 WL 5095128 (Fla. 2018); *In re DuPont*, 252 So. 3d 1130 (Fla. 2018);

Chapter 1: Use and Abuse of Judicial Power

4. May Judge Write Letters of Recommendation or Serve As Character Witness?

Page 10

There is no stage in the investigative process of the Florida Board of Bar Examiners when a judge can voluntarily write a letter commenting on the character and fitness of an applicant for membership to The Florida Bar. Opinion 18-10.

Page 11

And a judge may write a letter to a city council in support of the dedication of a baseball field in the name of the judge's deceased former bailiff; the letter would not be used "for investigatory and/or adjudicatory proceedings where legal rights, duties, privileges, or immunities would be decided." Opinion 17-09.

5. May Judge, Judicial Assistant, or Judicial Candidate Participate in Social Networking Websites?

Page 12

In *Law Offices of Herssein and Herssein, P.A. v. United Services Automobile Association*, __ So. 3d __, 2018 WL 5994243 (Fla. 2018), the Florida Supreme Court disapproved *Domville* and approved the decision of the Third District in *Law Offices of Herssein & Herssein, P.A. v. United Services Automobile Association*, 229 So. 3d 408 (Fla. 3d DCA 2017), and held that "an allegation that a trial judge is a Facebook 'friend' with an attorney appearing before the judge, standing alone,

does not constitute a legally sufficient basis for disqualification."

- **Opinion 17-24 (Election)** (judicial candidate may not establish open Facebook page to ask individuals to sign petitions for candidate to qualify to run without paying qualifying fee, but committee of responsible persons may, as long it is clear that Facebook page is not maintained by candidate personally).

Chapter 2: Ex Parte Communications

3. What Are Some Examples of Violations of Prohibition Against Ex Parte Communications?

Pages 21–22

In re Contini, 205 So. 3d 1281 (Fla. 2016) (court ordered public reprimand, letter of apology, judicial mentoring for three years, completion of stress management program, and assessment of costs for judge "(1) sending an *ex parte* e-mail to the Broward Public Defenders Office; (2) failing to seek a recusal or transfer when an appeal effectively froze his division; and (3) making impertinent and belittling remarks in open court about a pending matter").

Chapter 5: Disqualification and Recusal

7. When Does Manifestation of Personal Bias or Prejudice Against Attorney Disqualify Judge?

Page 41
In *In re Yacucci*, 228 So. 3d 523 (Fla. 2017), a judge was suspended for 30 days without pay and ordered to complete a judicial ethics course and pay JQC costs, based on an acrimonious relationship between the judge and an attorney "marked by lawsuits, a public altercation and televised disparagement, the jailing of [the attorney] for contempt, judicial campaign disputes, unsolicited attempts to influence a petition for writ of prohibition, and multiple refusals to disqualify himself."

9. Must Judge Recuse When Judge Has Reported Party's Attorney to The Florida Bar?

Page 43
Opinion 2018-18,

11. Is Recusal Required When Lawyer Appearing Before Judge Has Voiced Opposition to Judge's Election?

Page 45

A judge need not recuse merely because an attorney who regularly appears before the judge is considering running against the judge, but the judge may not ask the attorney directly whether he or she intends to run. Opinion 18-03.

13. Prior Service: Does Judge's Prior Service as Lawyer, Lower Court Judge, or Witness Require Disqualification?

Page 49

; *see also* Opinion 12-08 and Opinion 17-17 (recusal not required unless past representation affected judge's ability to be fair, but judge should disclose past representation to parties and lawyers)

14. When Is Economic Interest Disqualifying?

Page 52

In Opinion 18-11, the committee advised that a judge may continue to participate in the judge's former law firm's 401(k) retirement plan where the firm does not contribute to the plan or pay the plan's management fees, the account is an individual account and the judge controls the assets in it, and it is managed by an independent investment firm. But the judge must disclose the judge's participation in the firm's 401(k) plan to the attorneys and parties in any case in which members of the judge's former law firm are involved.

15. Must Judge Disqualify Self When Judge or Member of Judge's Family Is Party, Attorney, Financial Interest Holder, or Likely Material Witness in Proceeding, or Lower Court Judge in Decision to Be Reviewed by Judge?

Page 55

In Opinion 17-20, the committee advised a judge who had inquired about several issues involving relatives: The judge must be disqualified if an attorney from a law firm in which the judge's brother-in-law is a partner appears as counsel in a case before the judge (subject to remittitur); the judge may enter an agreed-upon order submitted by the parties appointing the judge's cousin as a mediator, if the selection of the cousin was initiated by the parties; and the judge need not necessarily be disqualified if the wife or daughter of the judge's cousin appears

before the judge, but disqualification may be required depending on the relationship between them, and the judge must disclose the relationship.

A general magistrate does not need to recuse from presiding over Marchman Act proceedings in which the appearing attorney represented the magistrate's brother-in-law in a Marchman Act case before another general magistrate in the same circuit, unless a personal bias or prejudice exists. But disclosure is required "until no reasonable person would consider the information relevant." Opinion 17-21.

16. What Is Judge's Responsibility When Spouse or Child Is Employed by or Works with Firm or Governmental Entity That Appears Before Court in Capacity of Party's Legal Representative?

Page 56
Opinion 18-26 (judge may preside over circuit court criminal division if judge's child is assistant public defender assigned to separate circuit court criminal division before another judge in same county, and judge need not automatically disclose that judge's child's employment);

Page 57

In Opinion 18-13, the committee recommended that a judge not preside over cases which the spouse supervises or in which the judge's spouse is the attorney of record.

In Opinion 17-03, the committee advised that a judge must disclose that a lawyer appearing before the judge has referred a case to the judge's spouse who is a lawyer and who may have shared, or will share, a fee with the referring lawyer. However, if the judge discloses that business relationship, recusal is not automatically required.

19. Must Judge Recuse Self When Law Firm Appearing in Case Before Judge Represented Judge and/or Family in Prior Case?

Page 59

A judge does not have to automatically recuse without request when a close relative and that relative's company are represented by a law firm whose lawyers have unrelated cases pending before the judge, but disclosure of the firm's relationship with the judge's spouse is required. Opinion 18-22.

Chapter 6: Civic, Charitable, Quasi-Judicial, and Extrajudicial Governmental

Activities

3. May Judge Be Member or Serve on Board of Directors of Civic Organization?

Page 65

- **Opinion 18-23** (judge may research, write, and appear in televised public service announcements that discuss issues surrounding family violence, and may be compensated for appearance).

- **Opinion 18-15** (senior judge may not serve on judicial council of church because judge would appear to be acting as legal advisor);

- **Opinion 17-19** (judge may not serve on board of directors of neighborhood family community center funded almost exclusively by government grant);

- **Opinion 17-18** (judge may not continue to serve in advisory role for nonprofit cultural organization that takes public positions on pending legislation, nor may judge sign confidentiality agreement with that organization as to matters learned while serving in that role);

- **Opinion 17-08** (judge may serve as "judge" for preliminary Miss America pageant competitions, and may participate at pageant competition by showcasing talent, such as singing, as long as judge acts "at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary");

- **Opinion 16-20** (judge may not serve on local bar association committee formed to host golf tournament to raise funds for Guardian Ad Litem Foundation, which appears in every dependency case before judge, but judge may attend tournament and assist with organizational non-fundraising tasks);

5. May Judge Be Member of Governmental Committee, Commission, or Task Force?

Pages 69–70

- **Opinion 18-19** (judge may accept appointment as non-voting chair of committee created by county commission to consider establishment of Children's Services Council, but judge should be mindful of significant restrictions that might hinder ability to chair committee).

- **Opinion 18-17** (judge may not serve on statutorily created council that nominates veterans to receive awards for service).

- **Opinion 18-09** (judge may serve as commissioner with National Conference of Commissioners on Uniform State Laws).

- **Opinion 17-15** (judge may speak to civic and community groups about Constitutional Revision Commission (CRC) as part of Florida Bar-sponsored "Protect Florida Democracy" program).

- **Opinion 17-02** (judge may accept appointment to Florida Impaired Driving Coalition, advisory body to Florida DOT, if it "does not engage in matters that could reasonably be perceived as favoring the State in DUI prosecutions").

- **Opinion 16-19** (judge may seek and accept appointment to Florida Constitutional Revision Commission if it does not interfere with performance of judicial duties; CRC is not part of executive or legislative branch, and its work involves improvement of law, legal system, and administration of justice);

6. May Judge Participate in Raising Funds for Civic, Charitable, and Governmental Organizations?

Page 73

- **Opinion 18-28** (judge may accept distinguished alumni award from law school judge graduated from when ceremony is fundraiser for scholarships for law students, as long as judge makes reasonable and continuous efforts to ensure that judge's participation falls within parameters of relevant canons);

- **Opinion 18-27** (JEAC members evenly divided on whether judges may solicit donations from fellow judges to provide hurricane relief directly to court employees affected by hurricane);

- **Opinion 18-25** (judge members of Florida Supreme Court committee may not solicit funds from The Florida Bar, voluntary bar associations, private for-profit and not-for-profit corporations, law firms, lawyers, and other groups for defraying cost of hosting annual conference of National Consortium on Racial and Ethnic Fairness in the Courts);

- **Opinion 18-05** (judge may permit legal aid organization to list judge as

member of host committee on invitation to fundraising event, as long as judge complies with Canon 4, including ban on direct solicitation of funds);

- **Opinion 17-22** (judge may accept award from local voluntary bar association at gala that is fundraiser for law students, if judge makes "reasonable and continuous efforts to ensure that the judge's participation falls within the parameters of the relevant Canons");

9. What Activities Are Permissible for Judge in Order to Secure Volunteers for Judicial System-Related Programs?

Pages 82–83

An administrative judge may send letters of appreciation to attorneys who have served as a pro bono guardian ad litem if the letters are general and are not signed by the judge who presided over the case for which the pro bono representation was provided, and copies should be kept in the court file and provided to the parties or their counsel. The court may also recognize such attorneys as a group at a bar luncheon or similar function. Opinion 17-23.

Chapter 7: Personal Finances and Financial Disclosure

2. What Gifts May Judge Receive and Must Gifts Be Reported?

Page 90

- **Opinion 18-07** (committee discussed what must be reported on Financial Disclosure Form 6A: judge typically need not report complimentary attendance at bar association social event or other event devoted to improvement of law, legal system, or administration of justice, or small gifts from bar associations and educational organizations given as token of appreciation; need not report waiver of annual dues to county bar association judge joined before becoming judge, or honorary bar association memberships, but must report waiver of annual foreign bar fees or dues; must report complimentary admission to legal seminar where non-judges were charged fee, if amount of fee and other charges waived exceeds $100 in same calendar year; must report reimbursement or direct payment of travel expenses and tuition waivers related to attendance at legal seminar outside state, attendance at annual statewide conference of judges, or travel to Tallahassee, as court conference designee, relating to legislative matters);

- **Opinion 17-11** (judge who received $10,000 anonymous cash gift and left it

with sheriff's office should disclaim any possessory interest in it);

- **Opinion 17-06** (chief circuit judge may accept donation of copiers to be used exclusively by attorneys in courtroom);

- **Opinion 17-04** (judge may accept food and drink provided by organizations and law firm that sponsor free diversity training seminar in courthouse);

4. May Judge Serve as Officer or Employee of Business

Page 94

- **Opinion 17-05** (senior judge may serve as court-appointed litigant-paid independent investigator in shareholders' derivative action in circuit where senior judge does not preside, but must disclose such service and/or refrain from presiding over cases involving certain parties, lawyers, and law firms);

- **Opinion 16-22** (senior judge may not work part time for insurance adjusting company as insurance umpire in any circuit in which senior judge may preside);

- **Opinion 16-18** (judge may not serve as litigant-paid special magistrate in circuit in which judge presides as senior judge);

- **Opinion 16-17** (judge may not own interest in, be employed by, or be compensated for services provided by closely held business with person who is not member of judge's family, nor may judge be employed by business judge's spouse owns interest in with person who is not member of judge's family);

6. May Judge Manage His or Her Family's Financial Investments?

Page 97

- **Opinion 17-13** (judge may serve as executor of estate, guardian, and/or trustee on behalf of sister and brother-in-law if doing so would not interfere with proper performance of judicial duties or pose likelihood of litigation before court on which judge serves).

- **Opinion 17-12** (judge may serve as co-trustee of irrevocable trust created by brother-in-law, who resides in Florida but not in circuit where judge presides, and with whom judge maintains close familial relationship).

9. May Judge Serve as Arbitrator or Mediator?

Pages 100–101
A senior judge may not serve on any case, including an appellate case pending in a District Court of Appeal, that originated in the judicial circuit where the senior judge currently provides arbitration services. Opinion 17-07. A senior judge may not serve as a litigant-paid special magistrate in a circuit in which the judge is currently presiding as a senior judge. Opinion 16-18.

14. Other Than Practice of Law, Are There Other Activities for Compensation from Which Judge Should Refrain?

Page 103
A judge may preside over a mock trial sponsored by local law enforcement but is advised not to offer any critique about the performance of law enforcement or how members of law enforcement can improve their presentation in a courtroom setting. Opinion 18-01.

Chapter 8: Political Activity

3. May Judge or Judicial Candidate Attend Political Gatherings?

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A judge may attend an inauguration or inaugural ball, as long as the judge is careful not to otherwise violate the Code, because it does not "constitute attendance at a political party function. Rather, [it] is open to members of all political persuasions; it is a national celebration for the entire country." Opinion 16-21. A judge up for re-election, who has no declared opponent, may attend and address the audience at an event sponsored by a nonpartisan group promoting minority voting when all candidates are invited to speak in favor of the candidate's election, even if the organization publicizes a list of both partisan and nonpartisan candidates it recommends for election. But a judge may not meet with members of a partisan political party club before the club's meeting, nor can the candidate attend a holiday party hosted by a partisan political party, even if no party business will take place and no speakers will appear. 17-25 (Election).

9. May Judge Solicit Funds in Support of Judge's Own Candidacy?

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This is distinguished from a judicial candidate personally receiving an unsolicited campaign contribution, which is not permitted. Opinion 17-26 (Election).

A judicial candidate may personally solicit voters' signatures on petition cards to be submitted at qualifying time instead of a filing fee, if the procedure used by the candidate does not include personal solicitations from attorneys or people appearing in court before the judge. Opinion 18-04.

10. Who May Solicit Campaign Funds for Judicial Candidacy?

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In Opinion 18-16 (Election), the committee stated: "An individual who solicits a contribution must be a member of the committee of responsible persons. Whether such individual may be compensated based on a percentage of the contributions received through his or her individual efforts is not addressed in the Canons."

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A candidate may retain a campaign management firm that has an owner or principal who holds an executive position in a partisan organization, if the candidate takes all necessary steps to ensure that the firm does not use the resources, facilities, or materials of the partisan political organization while working on the judicial candidate's behalf. Opinion 18-20 (Election).

12. May Judicial Candidate Publicly Endorse Another Candidate for Public Office?

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A judge may personally solicit the support and endorsement of public officials and citizens in the community, as long as the public official is not also campaigning for reelection and the endorsements "comply with the requirements of the Canons to maintain the dignity appropriate to judicial office and in a manner so as not to call into question the impartiality, integrity, and independence of the judiciary." Opinion 17-14 (Election). A judge may accept and advertise support or endorsement from former judicial candidates whom the judge defeated in the recent primary election cycle. Opinion 18-24 (Election).

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In Opinion 18-12 (Election), the committee stated that a judicial candidate may not provide campaign literature to partisan political group of volunteers for distribution to potential voters along with other partisan and nonpartisan candidates' flyers, as to do so would "undoubtedly give the impression that the judicial candidate is supporting the other candidates' races and partisan political affiliation – either of which is prohibited by the Canons."

16. May Judge Participate in Campaigns of Other Political Candidates?

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The Commentary to Canon 7A(1)(b) states that a judge or judicial candidate is not prohibited from privately expressing his or her views on judicial candidates or other candidates for public office. *See also* § 105.071, Fla. Stat.; *In re DeFoor*, 494 So. 2d 1121 (Fla. 1986). However, Canon 7A(1)(b) says judges are to provide no public support or opposition. Opinions 00-15 and 98-25 illustrate this point. A judge whose spouse runs for public office may not attend a campaign gathering at the judge's home or other locations but may appear in a family photograph to be used in campaign. Opinion 07-13, Opinion 17-16.

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When a judge's spouse publicly announces his or own candidacy for elected office, the judge's family may attend the announcement and be introduced at the announcement and campaign events, as long as the judge's position is not mentioned or featured at the announcement or campaign events. The judge's family members may attend future fundraising events for the spouse's campaign, if the judge's relationship to the spouse and the judge's position are not mentioned. The candidate spouse may explain the judge's absence by stating that the spouse's job or profession does not allow him or her to attend or endorse a candidate for office. Opinion 18-02.

21. What Are Some Examples of Canon 7 Violations?

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- ***In re Santino***, __ So. 3d __, 2018 WL 5095128 (Fla. 2018) (judge removed from office for campaign statements making inappropriate and false accusations against opponent, criminal defense attorney);

- ***In re DuPont***, 252 So. 3d 1130 (Fla. 2018) (judge removed from office for stating in forum that he would not find any statute unconstitutional because that would be "legislating from the bench," and for posting unverified and inaccurate information about opponent and his family);

- ***In re Shepard***, 217 So. 3d 71 (Fla. 2017) (public reprimand, 90-day suspension without pay, and payment of costs for judge for knowingly misrepresenting and "selectively editing" 1994 newspaper endorsement so it appeared she received 2014 endorsement for judicial campaign);

- ***In re Decker***, 212 So. 3d 291 (Fla. 2017) (six-month suspension without pay, public reprimand, and payment of costs for judge who falsely stated in campaign debate that he had never been accused of conflict of interest, and stated at judicial forum his affiliation with political party and support of political issue (judge was also charged with multiple violations of Rules of Professional Conduct as private attorney);

Appendix I: Florida Supreme Court Judicial Discipline Opinion Summaries

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In re Contini, 205 So. 3d 1281 (Fla. 2016) (court ordered public reprimand, letter of apology, judicial mentoring for three years, completion of stress management program, and assessment of costs for judge "(1) sending an *ex parte* e-mail to the Broward Public Defenders Office; (2) failing to seek a recusal or transfer when an appeal effectively froze his division; and (3) making impertinent and belittling remarks in open court about a pending matter").

In re Decker, 212 So. 3d 291 (Fla. 2017) (six-month suspension without pay, public reprimand, and payment of costs for judge charged with multiple violations of Rules of Professional Conduct as private attorney, including failure to disclose he was representing judge in other litigation, failing to advise clients of implications of common representation, and lack of candor to tribunal; judge was further found to have falsely stated in campaign debate that he had never been accused of conflict of interest, and stated at judicial forum his affiliation with political party and support of political issue).

In re Shepard, 217 So. 3d 71 (Fla. 2017) (public reprimand, 90-day suspension without pay, and payment of costs for judge for knowingly misrepresenting and "selectively editing" 1994 newspaper endorsement so it appeared she received 2014 endorsement for judicial campaign).

In re Yacucci, 228 So. 3d 523 (Fla. 2017), a judge was suspended for 30 days without pay and ordered to complete a judicial ethics course and pay JQC costs, based on an acrimonious relationship between the judge and an attorney "marked by lawsuits, a public altercation and televised disparagement, the jailing of [the attorney] for contempt, judicial campaign disputes, unsolicited attempts to influence a petition for writ of prohibition, and multiple refusals to disqualify himself."

In re DuPont, 252 So. 3d 1130 (Fla. 2018) (judge removed from office for stating

in forum that he would not find any statute unconstitutional because that would be "legislating from the bench," and for posting unverified and inaccurate information about opponent and his family).

In re Santino, __ So. 3d __, 2018 WL 5095128 (Fla. 2018) (judge removed from office for campaign statements making inappropriate and false accusations against opponent, criminal defense attorney).

In re White-Labora, __ So. 3d __, 2018 WL 5994087 (Fla. 2018) (court approved stipulated discipline of public reprimand for judge who improperly provided character reference letter, on her official court stationery, on behalf of criminal defendant awaiting sentencing in federal court).

Appendix II: Overview of Canons, Florida Code of Judicial Conduct

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CANON 6. Fiscal Matters of a Judge Shall be Conducted in a Manner That Does Not Give the Appearance of Influence or Impropriety; a Judge Shall Regularly File Public Reports as Required by Article II, Section 8, of the Constitution of Florida, and Shall Publicly Report Gifts, Expense Reimbursements and Payments, and Waivers of Fees or Charges; Additional Financial Information Shall be Filed With the Judicial Qualifications Commission to Ensure Full Financial Disclosure

Appendix III: Florida Code of Judicial Conduct

Pages 174–189

[On May 18, 2017, the supreme court made changes to Canon 5D, Canon 6, and the commentaries to those canons. *See In re Amendments to Code of Judicial Conduct*, 218 So. 3d 432 (Fla. 2017). On May 10, 2018, the supreme court amended Canon 6A(3) and Form 6A, and the commentary to 6A, to clarify that a judge must only report expense reimbursements and direct payments, and waivers of fees or charges, as required by Canons 6A(3) and 6B(2), when the reimbursement, payment, or waiver is from a source other than the state or a judicial branch entity. *See In re Amendments to Canon 6 of Code of Judicial Conduct*, 242 So. 3d 319.]

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PREFACE

Florida's Code of Judicial Conduct (the "code") establishes standards for ethical behavior of judges and is not intended as an exhaustive guide for all conduct of judges. Judges should also be governed in their judicial and personal conduct by general ethical standards. The preamble of the code, succinctly summarizing the role of the American judiciary, states:

> Our legal system is based on the principle that an independent, fair and competent judiciary will interpret and apply the laws that govern us. The role of the judiciary is central to American concepts of justice and the rule of law. Intrinsic to all sections of this Code are the precepts that judges, individually and collectively, must respect and honor the judicial office as a public trust and strive to enhance and maintain confidence in our legal system. The judge is an arbiter of facts and law for the resolution of disputes and a highly visible symbol of government under the rule of law.

In 1994, the Florida Supreme Court recounted that the first American canons of judicial ethics were adopted by the American Bar Association in 1924 and were later adopted and made applicable to the federal courts and most state courts. *In re Code of Judicial Conduct*, 643 So. 2d 1037 (Fla. 1994). The supreme court adopted the canons for use in Florida in 1941. In 1973, the court substantially adopted the American Bar Association's revisions to the Code of Judicial Conduct and, in 1994, adopted revisions to the code based largely on the Model Code of Judicial Conduct adopted by the American Bar Association in 1990. Florida's code was most recently revised in June 2015.

Introduction

1. Scope and Format of Benchguide

This benchguide is designed to address questions that judges and/or candidates for judicial office may have regarding ethical judicial conduct, the regulation of judges, and judicial discipline. It concentrates on the Code of Judicial Conduct, the advisory opinions of the Judicial Ethics Advisory Committee, and Florida Supreme Court opinions involving judicial discipline. This benchguide is not a comprehensive discussion of judicial conduct in Florida but uses a question and answer format to answer the most frequently asked questions, including providing guidance and resources in the areas that can result in the most serious disciplinary consequences.

2. To Whom Does Code Apply?

The Code of Judicial Conduct applies to justices of the Florida Supreme Court and judges of the district courts of appeal, circuit courts, and county courts. The Application section of the Code of Judicial Conduct (which appears at the end of the code) provides:

> Anyone, whether or not a lawyer, who performs judicial functions, including but not limited to a civil traffic infraction hearing officer, court commissioner, general or special magistrate, domestic relations commissioner, child support hearing officer, or judge of compensation claims, shall, while performing judicial functions, conform with Canons 1, 2A, and 3, and such other provisions of this Code that might reasonably be applicable depending on the nature of the judicial function performed.
>
> Any judge responsible for a person who performs a judicial function should require compliance with the applicable provisions of this Code.
>
> If the hiring or appointing authority for persons who perform a judicial function is not a judge, then that authority should adopt the applicable provisions of this Code.
>
> A. Civil Traffic Infraction Hearing Officer
>
> A civil traffic infraction hearing officer:

(1) is not required to comply with Section 5C(2), 5D(2) and (3), 5E, 5F, and 5G, and Sections 6B and 6C.

(2) should not practice law in the civil or criminal traffic court in any county in which the civil traffic infraction hearing officer presides.

A retired judge eligible to serve on assignment to temporary judicial duty, hereinafter referred to as "senior judge," is required to comply with all the provisions of this Code except Sections 5C(2), 5E, 5F(1), and 6A.

A retired justice or judge who chooses not to be assigned to judicial service and who is a member of The Florida Bar may practice law and still receive retirement compensation. The justice or judge has all the rights of an attorney and is no longer subject to the Code of Judicial Conduct.

An attorney who is a candidate for judicial office is subject to rule 4.8.2(b), Rules Regulating The Florida Bar, and must also comply with Canon 7 of the Code of Judicial Conduct. An unsuccessful candidate is subject to lawyer discipline for his or her campaign conduct.

A judge is subject to judicial discipline for conduct occurring before becoming a judge. *See In re Watson*, 174 So. 3d 364 (Fla. 2015); *In re Davey*, 645 So. 2d 398 (Fla. 1994); *In re Meyerson*, 581 So. 2d 581 (Fla. 1991); *In re Carnesoltas*, 563 So. 2d 83 (Fla. 1990); *In re Capua*, 561 So. 2d 574 (Fla. 1990); *In re Sturgis*, 529 So. 2d 281 (Fla. 1988); *In re Berkowitz*, 522 So. 2d 843 (Fla. 1988); *In re Byrd*, 511 So. 2d 958 (Fla. 1987); *In re Block*, 496 So. 2d 133 (Fla. 1986). When a judge is removed from office by the Florida Supreme Court on the basis of a Judicial Qualifications Commission proceeding, the removal order may also order the suspension of the judge as an attorney pending further proceedings. R. Regulating Fla. Bar 3-4.5.

The Code of Judicial Conduct makes only eight references, direct or indirect, to judicial staff or other persons who may be authorized to carry out certain responsibilities for a judge or who are subject to a judge's direction and control. Please see Appendix IV for an outline that attempts to capture as succinctly as possible what can be known with certainty about the Code's application to judicial staff.

3. How Is Code Enforced?

Article V, section 12, of the Florida Constitution establishes a Judicial

Qualifications Commission (JQC), which has the power to investigate and recommend to the Florida Supreme Court the removal from office of any justice or judge whose conduct "demonstrates a present unfitness to hold office, and to investigate and recommend the discipline of a justice or judge whose conduct. . . warrants such discipline." Art. V, § 12(a), Fla. Const. Upon recommendation from the JQC's hearing panel, the "supreme court may order that the justice or judge be subjected to appropriate discipline, or be removed from office with termination of compensation for willful or persistent failure to perform judicial duties or for other conduct unbecoming a member of the judiciary demonstrating a present unfitness to hold office, or be involuntarily retired for any permanent disability that seriously interferes with the performance of judicial duties." Art. V, § 12(c), Fla. Const.

In 1997, article V, section 12, of the Florida Constitution was amended to expand the range of disciplinary measures available for recommendation by the JQC and for imposition by the Florida Supreme Court. Before 1997, the only disciplinary consequences of a violation of the code were a public reprimand or removal from office. Now article V, section 12(a)(1), of the Florida Constitution defines "discipline" to include "fine, suspension with or without pay or lawyer discipline." *See, e.g.*, *In re Rodriguez*, 829 So. 2d 857 (Fla. 2002) (judge suspended and fined $40,000 for Canon 7 violations including accepting contributions made for purpose of influencing judicial decisions and filing misleading campaign reports with Division of Elections).

Only 22 judges have been removed from office for improper conduct. *See In re Santino*, __ So. 3d __, 2018 WL 5095128 (Fla. 2018); *In re Dupont*, 252 So. 3d 1130 (Fla. 2018); *In re Murphy*, 181 So. 3d 1169 (Fla. 2016); *In re Watson*, 174 So. 3d 364; *In re Hawkins*, 151 So. 3d 1200 (Fla. 2014); *In re Turner*, 76 So. 3d 898 (Fla. 2011); *In re Sloop*, 946 So. 2d 1046 (Fla. 2006); *In re Renke*, 933 So. 2d 482 (Fla. 2006); *In re Henson*, 913 So. 2d 579 (Fla. 2005); *In re McMillan*, 797 So. 2d 560 (Fla. 2001); *In re Shea*, 759 So. 2d 631 (Fla. 2000); *In re Ford-Kaus*, 730 So. 2d 269 (Fla. 1999); *In re Hapner*, 718 So. 2d 785 (Fla. 1998); *In re Graziano*, 696 So. 2d 744 (Fla. 1997); *In re Johnson*, 692 So. 2d 168 (Fla. 1997); *In re McAllister*, 646 So. 2d 173 (Fla. 1994); *In re Graham*, 620 So. 2d 1273 (Fla. 1993), *cert. denied*, 510 U.S. 1163, 114 S.Ct. 1186, 127 L.Ed.2d 537 (1994); *In re Garrett*, 613 So. 2d 463 (Fla. 1993); *In re Berkowitz*, 522 So. 2d 843 (Fla. 1988); *In re Damron*, 487 So. 2d 1 (Fla. 1986); *In re Leon*, 440 So. 2d 1267 (Fla. 1983); *In re Crowell*, 379 So. 2d 107 (Fla. 1979); and *In re LaMotte*, 341 So. 2d 513 (Fla. 1977). Additionally, justices of the supreme court, judges of district courts of appeal, and judges of circuit and county courts are subject to impeachment for misdemeanor in office. Art. III, § 17(a), Fla. Const.

4. What Are Judicial Ethics Advisory Committee Opinions?

In 1976, the Florida Supreme Court created a Committee on Standards of Conduct Governing Judges, now called the Judicial Ethics Advisory Committee (hereinafter "committee"). *Petition of the Committee on Standards of Conduct for Judges*, 327 So. 2d 5 (Fla. 1976); *Petition of Committee on Standards of Conduct for Judges*, 698 So. 2d 834 (Fla. 1997). The purpose of the committee is to render written advisory opinions to inquiring judges and judicial candidates concerning the propriety of contemplated judicial and nonjudicial conduct. The committee has rendered many advisory opinions interpreting the Code of Judicial Conduct.

Although the JQC is not bound by committee opinions, compliance with committee advice is admissible as evidence of good faith in judicial discipline matters. The opinions are at http://www.jud6.org/LegalCommunity/LegalPractice/opinions/jeacopinions/jeac.html **or** http://mobile.flcourts.org/jeac/ (this links to a mobile device friendly responsive interface to the Judicial Ethics Advisory Committee opinions located on the Sixth Circuit's website).

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Chapter One

Use and Abuse of Judicial Power

1. What Is Judicial Power and What Is Its Proper Use?

The canons explicitly and implicitly describe judicial power by stating what judges can and cannot do pursuant to their authority as judges. The preamble states, "[i]ntrinsic to all sections of this code are the precepts that judges, individually and collectively, must respect and honor the judicial office as a public trust and strive to enhance and maintain confidence in our legal system." Canon 1 provides as follows:

> An independent and honorable judiciary is indispensable to justice in our society. A judge should participate in establishing, maintaining, and enforcing high standards of conduct, and shall personally observe those standards so that the integrity and independence of the judiciary may be preserved. The provisions of this Code should be construed and applied to further that objective.

Canon 2A provides that "[a] judge shall respect and comply with the law and shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary." Canon 2B provides that "[a] judge shall not lend the prestige of judicial office to advance the private interests of the judge or others; nor shall a judge convey or permit others to convey the impression that they are in a special position to influence the judge. A judge shall not testify voluntarily as a character witness." The Commentary to Canon 2B states:

> Judges should distinguish between proper and improper use of the prestige of office in all of their activities. For example, it would be improper for a judge to allude to his or her judgeship to gain a personal advantage such as deferential treatment when stopped by a police officer for a traffic offense. Similarly, judicial letterhead must not be used for conducting a judge's personal business, although a judge may use judicial letterhead to write character reference letters when such letters are otherwise permitted under this Code.

Canon 3B(4) provides that "[a] judge shall be patient, dignified, and courteous to litigants, jurors, witnesses, lawyers, and others with whom the judge deals in an official capacity, and shall require similar conduct of lawyers, and of staff, court

officials, and others subject to the judge's direction and control." Canon 3C(4) provides that "[a] judge shall not make unnecessary appointments" and "shall exercise the power of appointment impartially and on the basis of merit." It prohibits a judge from practicing nepotism and favoritism. It also prohibits a judge from approving compensation of appointees "beyond the fair value of services rendered." Canon 4D(2)(a) provides that a judge "shall not personally or directly participate in the solicitation of funds" for an organization. Canon 3B(10) provides that "a judge shall not . . . make pledges, promises, or commitments that are inconsistent with the impartial performance of the adjudicative duties of the office."

Canon 3B(12) provides that "[a] judge shall not disclose or use, for any purpose unrelated to judicial duties, nonpublic information acquired in a judicial capacity."

Canon 5D(1)(a) provides that "[a] judge shall not engage in financial business dealings that . . . may reasonably be perceived to exploit the judge's judicial position." ALFINI, LUBET, SHAMAN & GEYH, JUDICIAL CONDUCT AND ETHICS 2.1–2.2 (LexisNexis/Matthew Bender 4th ed. 2007, 2010 supp.), describes judicial power thus:

> Judges have considerable power and discretion. While conducting pretrial proceedings, ruling on motions, directing trials, fashioning remedies in civil cases, and sentencing defendants in criminal cases, the actions of the judge are definitive, often uncontrolled by fixed rules or by a higher authority. . . .
>
> . . . Judicial discretion is perhaps best viewed as a subset of judicial power. That is, judicial discretion is the power to decide those matters that call for the exercise of personal judgment rather than the application of strict rules.

2. What Is Abuse of Judicial Power?

Abuse of judicial power is using the power of judicial office for the private gain of the judge or others. It is disregard for the meaning of the office by engaging in activities fraught with conflicts of interest or merely having the appearance of impropriety. *See* Opinion 06-14 (improper for judge to permit his interview to be used in commercially-marketed film about reading instruction program). It is using the office for self-aggrandizement for the purpose of depriving someone of legal rights or human dignity. Abuse of judicial power is failing, purposefully or carelessly, to uphold the honor of judicial office to the ultimate detriment of the

American legal system.

In *In re Turner*, 421 So. 2d 1077, 1081 (Fla. 1982), the Florida Supreme Court eloquently addressed the proper use of judicial power:

> Judges must necessarily have a great deal of independence in executing [their] powers, but such authority should never be autocratic or abusive. We judges must always be mindful that it is our responsibility to serve the public interest by promoting justice and to avoid, in official conduct, any impropriety or appearance of impropriety. We must administer our offices with due regard to the system of law itself, remembering that we are not depositories of arbitrary power, but judges under the sanction of law. Judges are expected to be temperate, attentive, patient and impartial, diligent in ascertaining facts, and prompt in the performance of a judge's duties. Common courtesy and considerate treatment of [others] are traits properly expected of judges. Court proceedings and all other judicial acts must be conducted with fitting dignity and decorum, reflecting the importance and seriousness of the inquiry to ascertain the truth.

3. What Are Some Examples of Abuse of Judicial Power?

A large number of Florida Supreme Court judicial discipline opinions involve the abuse of judicial power. Following are examples from a variety of cases.

- ***In re Schwartz***, 174 So. 3d 987 (Fla. 2015) (court approved revised consent judgment imposing 30-day suspension without pay, $10,000 fine, and requirement to write letter of apology on judge who cursed at and threatened to sue store owner who displayed opponent's campaign sign but refused to display hers; judge also improperly removed official court documents from file).

- ***In re Eriksson***, 36 So. 3d 588 (Fla. 2010) (judge publicly reprimanded and fined costs of proceeding for revoking bond for defendant who sought recusal, thereby punishing defendant for exercising legitimate legal right, and for employing unduly rigid and formulaic process in dealing with pro se litigants, so as to impede their ability to obtain relief and protection they sought from court).

- ***In re Bell***, 23 So. 3d 81 (Fla. 2009) (judge publicly reprimanded for ordering arrest of woman as putative primary aggressor, without complaint

from former husband or law enforcement officials, when former husband, with whom judge previously had interacted in professional settings, and woman, whom judge and his family knew from social interactions, appeared before judge for determination whether probable cause existed to charge former husband with domestic battery against her).

- ***In re Henderson***, 22 So. 3d 58 (Fla. 2009) (judge publicly reprimanded for acting as friend and mentor to convicted felon, including acting as proponent in felon's leasing apartment, when felon was criminal defendant in judge's court).

- ***In re Barnes***, 2 So. 3d 166 (Fla. 2009) (judge publicly reprimanded for inappropriately filing petition for writ of mandamus seeking to compel fellow judges "to provide for a meaningful First Appearance Hearing for all citizens accused of a crime who cannot immediately make bond").

- ***In re Aleman***, 995 So. 2d 395 (Fla. 2008) (judge publicly reprimanded for unreasonably forcing attorney to prepare handwritten motion for judge's disqualification within short time period, which was found to be improper in context of first-degree murder case in which death penalty was being sought).

- ***In re Maxwell***, 994 So. 2d 974 (Fla. 2008) (judge publicly reprimanded for ordering release of sister of former colleague despite facts that arrestee had no first appearance and was serving sentence of five years' probation for obtaining controlled substances by fraud, thus making her ineligible for pretrial release program).

- ***In re Adams***, 932 So. 2d 1025 (Fla. 2006) (judge publicly reprimanded for engaging in romantic relationship with attorney who appeared before him and for whom he granted continuance and dismissed charges).

- ***In re Sloop***, 946 So. 2d 1046 (Fla. 2006) (judge removed from office for failing to halt unjustified arrest and incarceration of traffic defendants waiting properly within adjoining courtroom; repeatedly displaying abusive and insulting behavior toward litigants).

- ***In re Albritton***, 940 So. 2d 1083 (Fla. 2006) (judge publicly reprimanded, suspended, and fined for pattern of improper conduct, including using judicial position to pressure attorneys to expend personal monies for his entertainment; making rude comments to attorneys and litigants; requiring

church attendance as condition of probation).

- ***In re Downey***, 937 So. 2d 643 (Fla. 2006) (judge publicly reprimanded and required to retire at end of term for habitual viewing of pornography from courthouse computer; failing to disclose juror-written communication; instigating improper contact and communication with female attorneys).

- ***In re Woodard***, 919 So. 2d 389 (Fla. 2006) (judge publicly reprimanded and ordered to anger management counseling for leaving arraignment to conduct re-election campaign interview; asserting in campaign literature inaccurate level of experience; arriving late to scheduled hearings; beginning hearings prior to scheduled start time without presence of party's attorney; issuing bench warrant leading to incarceration of expert witness without considering extenuating circumstances caused by hurricanes; acting rudely toward counsel, witnesses, and parties).

- ***In re Maloney***, 916 So. 2d 786 (Fla. 2005) (judge publicly reprimanded for directing police to release immediately from custody family friend who had been arrested for driving under the influence of alcohol).

- ***In re Diaz***, 908 So. 2d 334 (Fla. 2005) (judge publicly reprimanded, suspended, and fined for sending anonymous email to judge referring to another judge who reported illegal immigrants to federal authorities when he became aware of their status during hearings and containing comment recipient interpreted as implied threat of retaliation by Hispanic voters).

- ***In re Holloway***, 832 So. 2d 716 (Fla. 2002) (while serving as witness in friend's child custody hearing, judge had ex parte meeting with presiding judge in case, questioned that judge's impartiality by making crude remarks, contacted police during investigation, and lied under oath; judge also used judicial position to have brother's case heard earlier). (Note: this judge resigned from bench before Florida Supreme Court took final action.)

- ***In re Schwartz***, 755 So. 2d 110 (Fla. 2000) (judge publicly reprimanded for continually making rude and sarcastic remarks to counsel during oral arguments; in addition to reprimand, judge required to offer written apology, enter counseling for stress management, and video and audiotape future oral argument panels).

- ***In re Shea***, 759 So. 2d 631 (Fla. 2000) (judge removed from office for threatening to recuse himself from all of attorney's cases unless attorney

agreed to withdraw from representing client with whom judge had legal dispute; repeated instances of hostile behavior toward attorneys, court personnel, and other judges also contributed to removal from the bench).

- ***In re Richardson***, 760 So. 2d 932 (Fla. 2000) (judge publicly reprimanded for trying to influence police officers who arrested him by announcing he was judge, wanting to speak to chief of police, and stating he was "pro police"). (Note: underlying charge for which judge was arrested was ultimately dismissed, but attempt alone to avoid arrest was serious enough to merit discipline.)

- ***In re Graziano***, 696 So. 2d 744 (Fla. 1997) (judge removed from office after hiring friend as guardian ad litem despite friend's lesser qualifications than other applicants; granting her raise despite poor performance evaluations; and using insulting or threatening language toward court employees).

- ***In re Ward***, 654 So. 2d 549 (Fla. 1995) (judge publicly reprimanded for writing character reference letter for criminal defendant recommending probation; letter was not response to official request by defendant's probation officer).

- ***In re Fogan***, 646 So. 2d 191 (Fla. 1994) (judge sanctioned for writing character reference letter on official court stationery for personal friend facing sentencing in federal court; friend's federal probation officer had not requested letter).

- ***In re McAllister***, 646 So. 2d 173 (Fla. 1994) (judge removed from office for, among other things, "sexual harassment of a judicial assistant, a willingness to engage in ex parte communications and the intentional abuse directed toward the public defender's office").

- ***In re Golden***, 645 So. 2d 970 (Fla. 1994) (judge publicly reprimanded for making sexist and racial remarks; using crude, profane, and inappropriate language when presiding over legal proceedings; and failing to diligently perform duties of office).

- ***In re Perry***, 641 So. 2d 366 (Fla. 1994) (judge publicly reprimanded for unnecessarily abusing and berating recruiting officer for wearing army dress uniform to court; and exercising contempt powers in arbitrary and improper manner without regard for due process of law).

- ***In re Graham***, 620 So. 2d 1273 (Fla. 1993), *cert. denied*, 510 U.S. 1163, 114 S.Ct. 1186, 127 L.Ed.2d 537 (1994) (judge removed from office for repeatedly using judicial position to make allegations against and improperly criticize fellow judges, elected officials, and others without reasonable factual basis or regard for their reputations; exceeding and abusing judicial power by imposing improper sentences and by improperly using contempt power; acting in undignified and discourteous manner toward individuals appearing in his court; acting in manner that impugned public perception of integrity and impartiality of judiciary; and closing public proceedings).

- ***In re Perry***, 586 So. 2d 1054 (Fla. 1991) (judge publicly reprimanded for, among other things, verbally abusing and intimidating attorneys, witnesses, and parties).

- ***In re Trettis***, 577 So. 2d 1312 (Fla. 1991) (judge publicly reprimanded for rude and overbearing behavior in court, including engaging in improper tirades and outbursts, engaging in verbal abuse and intimidation of courthouse personnel and other judges, failing to disqualify self in proceedings when impartiality might reasonably have been questioned, allowing personal relationships to influence judicial conduct, and lending prestige of office in attempt to create employment position within judicial system for others; judge also agreed to undergo treatment to deal with stress).

- ***In re Carnesoltas***, 563 So. 2d 83 (Fla. 1990) (judge publicly reprimanded for, among other things, using judicial power to demean and ridicule attorney who had opposed judge in different case and, after having that attorney removed from courtroom, continuing to act as judge in matter to defendant's detriment).

- ***In re Capua***, 561 So. 2d 574 (Fla. 1990) (judge publicly reprimanded for, among other things, signing order releasing his son on own recognizance when son charged with nonbondable charge and required to go to bond hearing).

- ***In re Sturgis***, 529 So. 2d 281 (Fla. 1988) (judge publicly reprimanded for, among other things, twice displaying handgun while presiding at hearings and using position as circuit judge to prevent inspection of official court records relevant to matters involving judge's misdeeds).

- ***In re Eastmoore***, 504 So. 2d 756, 757 (Fla. 1987) (judge publicly

reprimanded for compelling newspaper reporter to come to his chambers although reporter's appearance not connected to legal proceeding but rather resulted from reporter's failure to respond to judge's greeting; for not giving child's mother full opportunity to testify while presiding over child custody matter; and for addressing the mother in improperly raised voice and acting in overbearing and dictatorial manner).

- ***In re Muszynski***, 471 So. 2d 1284 (Fla. 1985) (judge publicly reprimanded for ordering police officer to turn radio volume down or off while both were at restaurant; when police officer told judge that radio was as low as possible and regulations prohibited him from turning it off, judge, after identifying himself as circuit judge, "arrogantly castigated" officer. Later, judge sent officer letter directing him to appear at courthouse to explain alleged contemptuous conduct; letter stated failure to appear would constitute separate and independent contempt).

The above list of examples of abuse of judicial power resulting in some form of discipline is not comprehensive. Abuse of judicial power is frequently at the heart of the most serious discipline cases that result either in removal or in a resignation to avoid the indignity of a removal proceeding. Judges will sometimes ask whether there are trends that can be identified in the cases that lead to removal from the bench. While the summaries show a diverse array of abusive behaviors, in four of the above-cited cases, *McAllister*, *Graham*, *Graziano*, and *Shea*, there are common threads in the judges' ultimate removal from judicial office. These threads included repeated undignified, discourteous, threatening, and intimidating behavior or remarks. Perhaps the conduct could be most succinctly summarized as arrogant and arbitrary in word and deed. Moreover, these cases typically involve multiple instances of intimidating and abusive conduct across cases and various parties or aimed at a particular party, attorney, or court staff for whom the judge harbors personal animosity.

Other common threads in the most serious discipline cases include abuse of contempt power or judicial process, including threats to hold persons in contempt or compel their presence through threat of contempt proceedings. When these angry outbursts or instances of overreaching of authority go unchecked, they can then intensify. Because attorneys and parties have much at stake and often must face the same judge on repeated occasions, they are often inclined to ignore all but the most outrageous of these misuses of power or process.

Less frequent components, but still prevalent enough to qualify as common threads, are influence peddling or intervention in court cases or police proceedings

on the judge's own behalf or on behalf of a friend or family member; using influence to award someone a job, raise, or promotion; and writing prohibited character references for persons appearing before other disciplinary or adjudicatory authorities. As a caution, it bears repeating that what the actual summaries show is that a trends analysis alone can be misleading. While it seems that arrogance and unbridled anger are often at the core in each of the cases above (with the possible exception of the two cases involving letters of recommendation), the judges allowed arrogance and/or anger to cloud their judgment and typically engaged in multiple and increasingly serious abuses of power, after initial overstepping of the bounds went unchecked.

4. May Judge Write Letters of Recommendation or Serve As Character Witness?

Canon 2B governs letters of recommendation and states in pertinent part, "A judge shall not lend the prestige of judicial office to advance the private interests of the judge or others; nor shall a judge convey or permit others to convey the impression that they are in a special position to influence the judge." Generally, Florida Supreme Court opinions allow, and committee opinions advise, that it is ethically acceptable for judges to write letters of recommendation to educational institutions on behalf of persons about whom they have actual knowledge based on personal observation. *See In re Code of Judicial Conduct*, 643 So. 2d 1037 (Fla. 1994) (citing committee opinions 75-18, 75-22, 77-17, 79-3, 88-19, 92-02, 92-30, and 93-01, all identified as proper interpretations of the canon). Similarly, the opinions cited above indicate that a judge may write a letter of recommendation for a person applying for employment if the judge has actual knowledge and communicates factual information regarding character, knowledge, skills, and ability relevant to the job in question or relevant to professional competence generally. A judge may write a letter of recommendation for a former staff member's application for a fellowship. Opinion 07-06. A judge may provide to the public a list of attorneys who have indicated availability to represent laypersons who serve as guardians in guardianship proceedings. Opinion 08-24. A judge may endorse a proclamation to promote cooperation in the litigation discovery process. Opinion 09-19. A judge may not write a letter of recommendation for a friend's application for a real estate license, "where the friend has a prior misdemeanor arrest and the purpose of the letter is to serve as additional information attesting to the friend's 'honesty, truthfulness, trustworthiness, good character and good reputation.'" Opinion 13-08. There is no stage in the investigative process of the Florida Board of Bar Examiners when a judge can voluntarily write a letter commenting on the character and fitness of an applicant for membership to The Florida Bar. Opinion 18-10.

A judge may, however, present a "challenge coin" to jurors, court personnel, or citizens for contributions to the court or community. This "a much more private manner of recognition than writing a letter . . . or . . . article is permissible extrajudicial activity as long as the judge avoids inappropriate political activity or raising "issues of impartiality, lending the prestige of the judicial office, or allowing others to convey the impression that they are in a special position to influence the judge." Opinion 13-22. And a judge may write a letter to a city council in support of the dedication of a baseball field in the name of the judge's deceased former bailiff; the letter would not be used "for investigatory and/or adjudicatory proceedings where legal rights, duties, privileges, or immunities would be decided." Opinion 17-09.

5. May Judge, Judicial Assistant, or Judicial Candidate Participate in Social Networking Websites?

In *Chace v. Loisel*, 170 So. 3d 802 (Fla. 5th DCA 2014), the trial judge sent a Facebook "friend" request to the petitioner while her dissolution case was still before the court. On the advice of her attorney the petitioner ignored the request. After the final judgment of dissolution was entered, the petitioner filed a formal complaint against the judge, alleging that the judge had entered the dissolution order, which she alleged attributed most of the marital debt to her and ordered her to pay a disproportionately high alimony award, in retaliation against her for not accepting the request. The petitioner also "learned of other cases involving similar ex parte social media communications by the judge that resulted in her disqualification." As a motion for clarification was pending, the petitioner filed a motion to disqualify the judge, which was denied as legally insufficient. She filed a petition for writ of prohibition to quash the order, which the appellate court granted, stating:

> It seems clear that a judge's ex parte communication with a party presents a legally sufficient claim for disqualification, particularly in the case where the party's failure to respond to a Facebook "friend" request creates a reasonable fear of offending the solicitor. The "friend" request placed the litigant between the proverbial rock and a hard place: either engage in improper ex parte communications with the judge presiding over the case or risk offending the judge by not accepting the "friend" request.

The court discussed *Domville v. State*, 103 So. 3d 184 (Fla. 4th DCA 2012), and stated that it had reservations about that case, in which the Fourth District held that a judge "friending" the prosecutor in the case was sufficient to cause a well-

founded fear in a reasonably prudent person of not receiving a fair and impartial trial. The court in *Chace* stated that "*Domville's* logic would require disqualification in cases involving an acquaintance of a judge," which would not be workable or necessary, but that when it is a party, rather than an attorney, in a pending case, the judge's conduct raises far more concern. In *Law Offices of Herssein and Herssein, P.A. v. United Services Automobile Association*, __ So. 3d __, 2018 WL 5994243 (Fla. 2018), the Florida Supreme Court disapproved *Domville* and approved the decision of the Third District in *Law Offices of Herssein & Herssein, P.A. v. United Services Automobile Association*, 229 So. 3d 408 (Fla. 3d DCA 2017), and held that "an allegation that a trial judge is a Facebook 'friend' with an attorney appearing before the judge, standing alone, does not constitute a legally sufficient basis for disqualification."

The following are summaries of relevant committee opinions:

- **Opinion 17-24 (Election)** (judicial candidate may not establish open Facebook page to ask individuals to sign petitions for candidate to qualify to run without paying qualifying fee, but committee of responsible persons may, as long it is clear that Facebook page is not maintained by candidate personally).

- **Opinion 16-13 (Election)** (judicial candidate may include "Vote for [candidate's name] on [date]" in personal Facebook profile).

- **Opinion 12-12** (judge may not add lawyers who may appear before judge as connections on professional networking site LinkedIn or permit lawyers to add judge as their connection on that site; selection and communication of persons judge has approved is not distinguishable from social networks such as Facebook and "violates Canon 2B, because by doing so the judge conveys or permits others to convey the impression that they are in a special position to influence the judge").

- **Opinion 12-07** (judge may publish blog that reports cases "where the entries are intended to be neutral, nonjudgmental, brief summaries of the facts and holdings" and judge would not evaluate opinions but merely alert readers to cases and court rule changes).

- **Opinion 10-06** (judge who is member of voluntary bar association may participate in that association's Facebook account, which includes as "fans" or "friends" lawyers who use Facebook account to communicate among themselves about that organization and other non-legal matters; judge may

not allow attorneys who may appear before judge to become judge's Facebook "friends" even if judge posts disclaimer as to relevant meaning of "friend"; judge may not allow attorneys who may appear before judge to become judge's Facebook "friends" even if judge accepts as "friends" all attorneys who request to be judge's "friends" or all persons whose names judge recognizes).

- **Opinion 10-05** (judicial candidate may become "friends" on Facebook or social networking site with lawyers who may appear before the candidate if he or she becomes judge; however, eventual disqualification may be required).

- **Opinion 10-04** (judicial assistant may add lawyers who may appear before judge as "friends" on social networking site).

- **Opinion 09-20** (judge or judge's campaign committee may add "friends" and post comments on respective social networking pages; judge may not add "friends" who may appear before judge and may not permit such lawyers to add judge as their "friend").

6. What Contact with Investigative or Adjudicatory Bodies Is Permitted?

The case law and committee opinions advise that a judge may not initiate contact with an investigatory or adjudicatory body determining rights, duties, privileges, or immunities of a person requesting that the judge contact the body on his or her behalf. *See In re Ward*, 654 So. 2d 549 (Fla. 1995) (judge wrote letter of character reference on official court stationery on behalf of friend awaiting sentencing in federal court, a violation of Canon 2B, for which judge received public reprimand); Opinion 75-06 (improper to write character letter for attorney who is principal in disbarment proceeding); Opinion 75-18 (improper to write letter to bar grievance committee or supreme court in disciplinary proceeding or to federal judge in criminal sentencing without official request); Opinion 82-15 (improper to write letter voluntarily to Board of Bar Examiners); Opinion 88-11 (improper to communicate with Florida Bar members on behalf of Florida Bar presidential candidate); Opinion 89-04 (improper to ask Board of Bar Examiners to expedite application for law clerk); Opinion 89-15 (impermissible to appear before judicial nominating commission to introduce candidate or express opinion about who is best qualified to serve as judge); Opinion 10-29 (improper to write letter of commendation to governor on behalf of person previously convicted of felony who is seeking pardon); Opinion 10-34 (improper to write letter to another judge advocating drug program as alternative to incarceration for relative of judge's

friend and impermissible to testify to explain program to other judge).

Case law in two notable decisions does suggest that some communications initiated by a judge with an investigative or adjudicatory body may be permissible. In *In re Frank*, 753 So. 2d 1228 (Fla. 2000), the court was faced with a judge who contacted Florida Bar grievance attorneys to express frustration with their handling of a matter. Notably, the judge did not ask for or demand special treatment based on his position. The court noted at 1240–1241:

> Knowledge that one is a judicial officer or respectful conduct in response to such knowledge does not automatically translate into a determination that a judicial position has been abused. Judge Frank did not forfeit the right to make proper inquiry concerning the pending matters simply because he held judicial office. A judicial officer should not be sanctioned simply because those with whom he or she has interaction are aware of the official position. The use of a judicial position or power of the position in an unbecoming manner requires more than simply someone being aware of one's position. The gravamen of the charge under the circumstances requires that there be some affirmative expectation or utilization of position to accomplish that which otherwise would not have occurred. The testimony here demonstrates that those interacting with Judge Frank were aware of his position, but their actions, while respectful of his position, were none other than those normally expected under any other circumstance.

So, simply criticizing or complaining about the performance of the investigative or adjudicatory body, as any citizen might do, appears to be permissible. Likewise, simply making "a proper inquiry concerning the pending matters" is likened to what anyone has a right to do. Also significant, however, appears to have been the testimony from those interacting with the judge that they did not perceive that the judge was leveraging his position to obtain special treatment. This should cause some concern among judges contemplating initiating contact with an adjudicatory or investigatory body since an outcome might hinge on subjective perceptions of those who deal with the judge on the matter.

This idea that a judge may in some circumstances appropriately initiate contact is nonetheless iterated more recently and expressly affirmed in *In re Holloway*, 832 So. 2d 716 (Fla. 2002). In that case, although the judge was suspended on other grounds, the court found it permissible that the judge in question had made a telephone call to a police officer investigating a custody issue for a friend of the judge. In this case, the judge did not attempt to exert influence but apparently only asked to receive the same amount of information that another caller would have

been allowed to request and obtain. Again, as a caution, the results in these cases are highly fact specific, and the fact that they are reported cases at all suggests the need for a high degree of circumspection in such situations. As the holdings in *In re Ward*, 654 So. 2d 549 (Fla. 1995), and *In re Fogan*, 646 So. 2d 191 (Fla. 1994), indicate, unsolicited contact with the adjudicatory or investigative entity often involves the judge in impermissible lending of the prestige of office, whether intended or not. It is this appearance of impropriety judges must strive to avoid.

7. When Is Judge's Use of Judicial Letterhead Improper?

As the Florida Supreme Court noted in *In re Code of Judicial Conduct*, 643 So. 2d 1037, 1039 (Fla. 1994), adopting major revisions to the Code of Judicial Conduct,

> [t]he Committee [on Standards of Conduct] has questioned whether and under what circumstances a judge may write a character reference letter and under what circumstances a judge may use official court letterhead. The confusion over these issues was caused in part by our approval of the language used in the stipulation of fact and discipline in *In re Judge Abel*, 632 So. 2d 600 (Fla.1994). Although we believe that the proposed Canon 2B sufficiently addresses the issues raised by the Committee, we have added the following underscored language to the commentary regarding judicial letterhead: "Similarly, judicial letterhead must not be used for conducting a judge's personal business, *although a judge may use judicial letterhead to write character reference letters when such letters are otherwise permitted under this Code.*"

The court noted that bar admission authorities and law schools solicit recommendation letters from judges and found that if it is appropriate to write a letter, a judge may use stationery that reflects the judge's office. *See also In re Fogan*, 646 So. 2d 191 (Fla. 1994) (reprimanding judge publicly for writing character reference on official court stationery for personal friend who was to be sentenced in federal court; probation officer had not solicited letter but rather defendant requested letter). It is very important that judges not send voluntarily submitted written statements with the knowledge and understanding that they will be used directly or indirectly in an adjudicatory proceeding. *Id.* at 192 (citing Opinion 75-06).

In Opinion 12-35, the issue was whether a judge may, as chair of the local Juvenile Justice County Council and the Children's Services Council, "write a letter on judicial letterhead in support of a district school board's federal grant application

when a portion of the grant funds will be used by the district school board to fund a delinquency prevention program being developed by the joint efforts of the two councils." The committee answered in the affirmative, as long as the funds would "be used solely for the delinquency prevention program and other programs and projects which concern the law, the legal system and the administration of justice; (2) these programs do not cast doubt on the judge's impartiality; and (3) the judge discloses the judge's role in writing the support letter in cases before the judge which involve issues or persons associated with the delinquency prevention program or other programs funded by the grant." If the judge determines that any of the remaining grant funds will be used for projects or programs that do not concern the law, the legal system, or the administration of justice, then the judge "ethically may not write the letter of support for the federal grant application."

A judge may not use judicial stationery or personnel in communicating with former clients. Opinion 13-11.

8. May Judge Allow Probationer to Attend Course Designed to Promote Probation Success?

The committee advised in Opinion 10-10 that there is no ethical bar to allowing a probationer to attend a course sponsored by a for-profit organization. The course teaches coping skills to new probationers to promote success on probation. The committee noted that the question as to whether the judge can legally waive all or part of a probationer's community service requirement, if the probationer completes the course, is outside the committee's jurisdiction.

9. May Judge Allow Juveniles to Perform Their Community Service Hours by Participating in Jogging Program with Judge?

The committee advised in Opinion 10-37 that such an action, even if well intentioned, could place the judge in situations undermining the impartiality of his or her judicial office. The committee stated that the proposed program likely would violate Canons 2A, 2B, 3B(7), and 5A(1), (2), (5), and (6).

10. Does Judge Have Obligation to Report Possible Criminal Activity Judge Becomes Aware of During Proceeding?

In Opinion 12-11, a judge had learned during a hearing that the parents of the child who was the subject of the hearing were 16 and 21 years old, "revealing a probable sex crime by the 21-year old," who was not represented by counsel. The committee concluded that under the Code of Judicial Conduct the judge had no obligation to

report possible criminal acts the judge became aware of during the hearing. The committee noted that the question of whether a moral, statutory, or other non-Code duty to report exists was beyond the committee's authority and noted that while the judge could voluntarily report the information, "the [judicial privilege] protections of Canon 3D(3) may not apply, and there may be further ethical consequences, such as disqualification, depending on the facts involved."

In Opinion 15-03, citing Canon 3B(12), the committee reiterated that nonpublic information acquired in a judicial capacity may not be disclosed "for any purpose" unless the information relates to the judge's judicial duties (judge may not tell employer of party to domestic violence hearing about conduct allegedly committed by that party).

11. May Judge-Elect Serve As Witness at Hearing That Commenced While Judge-Elect Was Candidate But Was Continued Until After Judge-Elect Was Elected to Bench?

The committee in Opinion 12-27 advised that a judge-elect could complete testimony as an expert on attorney's fees that had been interrupted and continued to a date that was after the judge-elect was elected to the bench. Relevant factors were that the direct testimony had already been completed, the case would likely be concluded before the judge-elect's term began, and forcing the parties to start over on the issue would cause substantial expense and delay.

Chapter Two

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Chapter Two

Ex Parte Communications

1. What Are Ex Parte Communications and When and Why Are They Prohibited?

Black's Law Dictionary defines "ex parte" as "[o]n or from one party only, usually without notice to or argument from the adverse party." Black's Law Dictionary 576 (8th ed. 2007). Canon 3B(7) provides as follows:

> A judge shall accord to every person who has a legal interest in a proceeding, or that person's lawyer, the right to be heard according to law. A judge shall not initiate, permit, or consider ex parte communications, or consider other communications made to the judge outside the presence of the parties concerning a pending or impending proceeding except that:
>
> (a) Where circumstances require, ex parte communications for scheduling, administrative purposes, or emergencies that do not deal with substantive matters or issues on the merits are authorized, provided:
>
> (i) the judge reasonably believes that no party will gain a procedural or tactical advantage as a result of the ex parte communication, and
>
> (ii) the judge makes provision promptly to notify all other parties of the substance of the ex parte communication and allows an opportunity to respond.
>
> (b) A judge may obtain the advice of a disinterested expert on the law applicable to a proceeding before the judge if the judge gives notice to the parties of the person consulted and the substance of the advice and affords the parties reasonable opportunity to respond.
>
> (c) A judge may consult with other judges or with court personnel whose function is to aid the judge in carrying out the judge's adjudicative responsibilities.
>
> (d) A judge may, with the consent of the parties, confer separately with the parties and their lawyers in an effort to mediate or settle matters pending

before the judge.

(e) A judge may initiate or consider any ex parte communications when expressly authorized by law to do so.

In ALFINI, LUBET, SHAMAN & GEYH, JUDICIAL CONDUCT AND ETHICS 5.2–5.3 (LexisNexis/Matthew Bender 4th ed. 2007, 2010 supp.), the authors explain the purpose of the rule against ex parte communications:

> . . . *Ex parte* communications are those that involve fewer than all the parties who are legally entitled to be present during the discussion of any matter. They are barred in order to ensure that "every person who is legally interested in a proceeding is given the full right to be heard according to law."
>
> *Ex parte* communications deprive the absent party of the right to respond and be heard. They suggest bias or partiality on the part of the judge. *Ex parte* conversations or correspondence can be misleading; the information given to the judge "may be incomplete or inaccurate, the problem can be incorrectly stated." At the very least, participation in *ex parte* communications will expose the judge to one-sided argumentation, which carries the attendant risk of an erroneous ruling on the law or facts. At worst, *ex parte* communications are invitations to improper influence if not outright corruption.

Ex parte communications include not only communications between judges and lawyers but also communications between judges and litigants, witnesses, and law enforcement personnel. Ex parte communications also include communications with another judge for the purpose of trying to influence that judge on behalf of a party appearing before him or her in a case. *See In re Holloway*, 832 So. 2d 716 (Fla. 2002) (judge suspended for, among other infractions, angrily engaging in ex parte communication with another judge regarding scheduling hearing in friend's case and making crude comments about other judge).

- **Opinion 09-17** (judge and magistrate may not communicate on point of law in case referred to magistrate without informing parties).

Ex parte communications are barred when they concern pending or impending litigation. The committee in Opinion 11-16 advised that a judge should not speak to a conference of judges, court administrators, and others, about a trial presided over by the judge, the result of which was being appealed. "Thus, general

discussion of the law, outside of the explicit or implicit context of a case, will not usually be considered an *ex parte* communication. Similarly, incidental contact between a judge and a party or attorney, even in the midst of trial, will not violate the rule so long as the case itself is not discussed." ALFINI, *supra*, 5.4. Some communications by judges are permitted with certain limitations.

SHAMAN, *supra* at 150. Some communications by judges are permitted with certain limitations.

- **Opinion 07-19** (judge may review sworn arrest warrants and other probable cause documents and make preliminary probable cause finding prior to defendant's first appearance but may not enter preliminary finding on final probable cause determination form).

- **Opinion 06-12** (judge may meet with state attorney or defendant to discuss factual issues regarding murder case judge prosecuted while he was assistant state attorney).

2. Can Ex Parte Communication Be Remedied?

According to ALFINI, LUBET, SHAMAN & GEYH, JUDICIAL CONDUCT AND ETHICS 5.22–5.23 (LexisNexis/Matthew Bender 4th ed. 2007, 2010 supp.),

> The 2007 Model Code of Judicial Conduct in Rule 2.9(A) instructs judges to "make provision promptly to notify the parties of the substance of the communication and provide the parties with an opportunity to respond." Courts have held that prompt disclosure of the *ex parte* communication to all affected parties may avoid the need for other corrective action. . . .
>
> Where irremediable prejudice has occurred, of course, disclosure will not be sufficient to avoid disqualification or reversal.

3. What Are Some Examples of Violations of Prohibition Against Ex Parte Communications?

Several judges have been disciplined for engaging in improper ex parte communications. See the following examples:

In re Contini, 205 So. 3d 1281 (Fla. 2016) (court ordered public reprimand, letter of apology, judicial mentoring for three years, completion of stress management program, and assessment of costs for judge "(1) sending an *ex parte* e-mail to the

Broward Public Defenders Office; (2) failing to seek a recusal or transfer when an appeal effectively froze his division; and (3) making impertinent and belittling remarks in open court about a pending matter").

In re Holder, 195 So. 3d 1133 (Fla. 2016) (court approved stipulated discipline of public reprimand and completion of six additional CJE hours on ethics for judge who, intending to help defendant who was Army Green Beret over whose case he was presiding, engaged in inappropriate ex parte communication with state attorney and made public offer to convert defendant's remaining community control to probation before conducting hearing on that matter).

In re Holloway, 832 So. 2d 716 (Fla. 2002) (judge suspended for, among other violations, engaging in angry ex parte communications with another judge and making crude remarks about that judge while trying to influence scheduling change for friend);

In re Perry, 586 So. 2d 1054 (Fla. 1991) (judge engaged in improper ex parte communication concerning pending or impending proceedings in violation of former Canon 3A(4) of Code of Judicial Conduct, including instance that required new trial);

In re Clayton, 504 So. 2d 394 (Fla. 1987) (on four occasions, judge conducted improper ex parte proceedings with defendants or defense counsel to dispose of criminal cases; in some instances, dispositions took place without defendant's knowledge, including pleas and sentences, and in some cases were not done in open court. Court noted former Canon 3A(4) was written with clear intent of excluding all ex parte communications except when expressly authorized by statute or rule, citing Thode, Reporter's Notes to Code of Judicial Conduct (1973));

In re Damron, 487 So. 2d 1 (Fla. 1986) (improper for judge to consider ex parte communications in making specific judicial decision and to grant ex parte request to set aside DUI conviction without notice to state; judge engaged in ex parte communications with parties, attorneys, and citizens concerning matters before his court);

In re Leon, 440 So. 2d 1267 (Fla. 1983) (judge disciplined for engaging in improper ex parte conversations with another judge and state attorney regarding cases);

In re Turner, 421 So. 2d 1077 (Fla. 1982) (judge had ex parte conference with party's attorney);

In re Boyd, 308 So. 2d 13 (Fla. 1975) (justice publicly reprimanded for improperly receiving ex parte memorandum from attorney representing parties in case before court);

In re Dekle, 308 So. 2d 5 (Fla. 1975) (justice publicly reprimanded for using ex parte memorandum from attorney for one party in case before him in preparing judicial opinion).

Chapter Three

Controlling Attorneys' Manifestations of Bias or Prejudice

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Chapter Three

Controlling Attorneys' Manifestations of Bias or Prejudice

1. Does Code of Judicial Conduct Require Judges to Discipline or Report Attorneys for Manifestations of Bias or Prejudice?

Canon 3B(6) expressly proscribes a lawyer "manifesting, by words, gestures, or other conduct, bias or prejudice based upon race, sex, religion, national origin, disability, age, sexual orientation, or socioeconomic status, against parties, witnesses, counsel, or others." It does not preclude legitimate advocacy when these statuses or other similar factors are issues in the proceeding. When made aware of these manifestations of bias, or any violation of the Rules Regulating The Florida Bar, the judge must take "appropriate action" pursuant to Canon 3D(2). The commentary to Canon 3D states, "Appropriate action may include direct communication with the judge or lawyer who has committed the violation, other direct action if available, or reporting the violation to the appropriate authority or other agency. If the conduct is minor, the canon allows a judge to address the problem solely by direct communication with the offender." If the question raised is "substantial," the judge "is required under this canon to inform the appropriate authority."

A judge also must be familiar with rule 4-8.4(d), Rules Regulating The Florida Bar, containing three categories not mentioned in the canon prohibiting certain manifestations of bias or prejudice in connection with the practice of law. Specifically, rule 4-8.4(d) prohibits knowingly, or through callous indifference, disparaging, humiliating, or discriminating against litigants, jurors, witnesses, or other lawyers based on marital status, employment, or physical characteristics. These three categories are not enumerated in Canon 3B(6), but because Canon 3D(2) requires a judge to take action when a Bar rule is violated, judges must consider these three classifications when determining whether to take action against an attorney. Also relevant is rule 4-8.3(a), which requires a lawyer to report another lawyer to The Florida Bar any time that lawyer's conduct raises a substantial question as to that lawyer's honesty, trustworthiness, or fitness as a lawyer in other respects.

Attorney discipline for sexist and racist speech has been a subject of much controversy. Discussion of First Amendment challenges to similar rules

promulgated by the American Bar Association or adopted in other states is beyond the scope of this chapter. For a detailed discussion of the First Amendment issues surrounding the curtailment of attorney speech, see Rotunda, Attorney Discipline for Sexist and Racist Speech, presentation at ABA-APRL-NOBC Conference in Miami, Florida (Feb. 10, 1995).

The Florida Supreme Court Racial and Ethnic Bias Study Commission, the Florida Supreme Court Gender Bias Commission, and, most recently, the Standing Committee on Fairness and Diversity identified significant problems experienced by minorities and women in the legal profession and by minority and female litigants in Florida's justice system. These problems are not unique to Florida, having been identified by similar task forces throughout the country. For thorough consideration of these issues, see generally Warshawsky, *The Judicial Canons: A First Step in Addressing Gender Bias in the Courtroom*, 7 Geo. J. Legal Ethics 1047–1056 (1994); Bowman, *Bibliographical Essay: Women and the Legal Profession*, 7 Am. U. J. Gender & Soc. Pol. L. 149 (1999). It also bears noting that Canon 3B(5) requires judges to adhere to the same standards in refraining from manifestations of bias. They must also take the same Canon 3D(2) "appropriate action" when judicial colleagues violate the rule.

2. What Is "Appropriate Action" Against Manifestations of Bias?

In *In re Code of Judicial Conduct*, 656 So. 2d 926 (Fla. 1995), the Florida Supreme Court amended the commentary to Canon 3D, which concerns what action a judge should take for an attorney's or another judge's misconduct.

According to the commentary, "[a]ppropriate action may include direct communication with the judge or lawyer . . . , other direct action if available, or reporting the violation to the appropriate authority." There was a concern expressed before the amendment that all three steps were required no matter what the ethical infraction and irrespective of its seriousness. As noted in the immediately preceding answer, a judge faced with a manifestation of bias must assess whether the infraction is minor or substantial. Judges now clearly have the power to respond progressively depending on the egregiousness of the infraction. The duty to act encompasses counseling in chambers, admonishing in court on the record, reporting misconduct to a senior partner or managing government lawyer, and ultimately, filing a formal grievance. Courts need this latitude and the public's trust in their discretion to address bias in the manner that best befits the circumstances and least jeopardizes the rights of the parties. Obviously, too,

repeated instances of manifestations of bias must be handled with progressive severity.

Chapter Four

Errors of Law

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Errors of Law

1. Are Errors of Law Misconduct Under Code of Judicial Conduct?

Generally, errors of law are not ethical violations. When an attorney believes the court has ruled incorrectly, the appropriate vehicle for addressing the concern is the appellate process.

> When a judge commits a legal error, it usually is a matter for appeal rather than judicial discipline. In some instances, however, legal error may amount to judicial misconduct calling for sanctions ranging from admonishment to removal from office. Imposing discipline upon a judge for an incorrect legal ruling is an extremely sensitive issue because of the potential impact on judicial independence.

ALFINI, LUBET, SHAMAN & GEYH, JUDICIAL CONDUCT AND ETHICS 2.4 (LexisNexis/Matthew Bender 4th ed. 2007, 2010 supp.) (noting the disciplinary process should not be used as a substitute for appeal; some take the position that legal error should never be dealt with in a judicial misconduct proceeding). However, there are rare but recognized instances in which an error of law can constitute misconduct. Both egregious legal error and legal error motivated by bad faith are appropriate subjects for discipline. In Florida, Canon 3B(2) requires that judges maintain professional competence. If a judge makes a legal error so extreme that it suggests a lack of minimal competence, this probably is an ethical problem. Likewise, if a judge purposely misapplies the law in bad faith, this undermines confidence in the integrity and impartiality required by Canon 2.

None of the recorded discipline cases in Florida specifically address legal error as an ethics violation. Nevertheless, a number of cases generally discuss the responsibility to follow the law.

> In the interest of protecting and preserving a strong and independent judiciary, we must be careful never to judge a respondent and determine whether to remove him from office on the grounds that he possesses an unpopular philosophy, has offensive idiosyncrasies, has rendered unpopular decisions or is too compassionate. Unless his attitudes, prejudices or beliefs are translated into action or inaction

> that constitutes a violation of law or the Code of Judicial Conduct, rendering him presently unfit to hold the office, he should be free to make his decisions and administer his office without fearing an investigation by the [JQC] that could lead to removal from office. [Emphasis added]

In re Taunton, 357 So. 2d 172, 177–178 (Fla. 1978).

In the above case, a judge was reprimanded for placing himself in a position in which his impartiality could reasonably be questioned. The specific acts committed by the judge showed a pattern of misapplication of or failure to abide by the law. Although the court found the conduct to have been well intentioned and compassionate, the judge was nevertheless reprimanded for, among other things, improperly using county facilities and supplies, refusing to issue a writ of replevin and assess costs, conducting an ex parte conference, and refusing to execute a judgment.

Similarly, in *In re Crowell*, 379 So. 2d 107, 110 (Fla. 1980), a judge was removed from office for demonstrating a present unfitness after engaging in a "pattern of conduct over a long period of time, involving persistent abuse of the contempt power, which demonstrates a lack of proper judicial temperament and a tendency to abuse the authority of the office." The removed judge in this matter clearly violated the law in a number of different proceedings by failing to apply proper standards for holding attorneys in contempt, attempting to have certain state employees suspended or fired, and demanding improper stipulations from counsel in another matter. Ultimately, the JQC concluded that the incidents showed "a propensity to summarily adjudicate and incarcerate." 379 So. 2d at 108. Therefore, when judicial disregard for law or procedure rises to the level of an abuse of power, it is certainly a basis for discipline and possible removal. For a more thorough discussion of abuse of judicial power, see Chapter One. See the below summarized opinions:

- In ***In re Barnes***, 2 So. 3d 166 (Fla. 2009), a judge was reprimanded for inappropriately filing petition for writ of mandamus seeking to compel fellow judges "to provide for a meaningful First Appearance Hearing for all citizens accused of a crime who cannot immediately make bail";

- In ***In re Bell***, 23 So. 3d 81 (Fla. 2009), a judge was reprimanded for ordering arrest of woman for domestic abuse, without complaint from anyone, when former husband appeared for probable cause determination as to charging him with battery against her;

- In ***In re Maxwell***, 994 So. 2d 974 (Fla. 2008), a judge was reprimanded for ordering release of sister of former colleague despite the facts that arrestee had no first appearance and was serving sentence of five years' probation for obtaining controlled substances by fraud, and therefore was ineligible for pretrial release program.

Chapter Five

Disqualification and Recusal

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Chapter Five

Disqualification and Recusal

1. Is There Difference Between "Legal" and "Ethical" Bases for Disqualification and Recusal?

There is a difference between legal and ethical bases for disqualification and recusal. The ethical basis for disqualification found in Canon 3E are the primary subject of this chapter. Canon 3E addresses instances involving conflicts of interest or perceived conflicts that require judges to disqualify themselves from hearing certain matters. Sometimes a judge may be compelled to disqualify on legal grounds, under court rule or statute. The legal requirements, which are beyond the scope of this volume, are found in chapter 38, Florida Statutes, and the Florida Rules of Judicial Administration. Although this chapter concerns only the ethical requirements of Canon 3E, the legal and ethical grounds for disqualification overlap, and the connections are noted as they arise in the following discussion.

2. What Are Six Ethical Bases for Disqualification in Canon 3E?

The ethical bases for disqualification fall generally into one of six categories:

a. Personal bias or prejudice, Canon 3E(1)(a).

b. Personal knowledge of disputed facts, Canon 3E(1)(a).

c. Service of judge as lawyer, lower court judge, or material witness in the proceeding, Canon 3E(1)(b).

d. Economic interest in the matter (personal, business, or family), Canon 3E(1)(c).

e. Judge or family member as party, attorney, financial interest holder, likely material witness in a proceeding, or lower court judge in decision to be reviewed, Canon 3E(1)(d); Canon 3E(1)(e).

f. Judge has made public statement (while on bench or as candidate) that commits or appears to commit the judge as to parties, classes of parties, issues, or controversies in a proceeding, Canon 3E(1)(f).

All of the Florida Supreme Court and committee opinions interpreting Canon 3E fall into one of these six categories, each of which is examined in detail below. However, the plain language of Canon 3E is not exclusive.

3. Procedurally, What Must Judge Do When Faced with Motion to Disqualify?

In determining the legal sufficiency of motions alleging any of these grounds, the judge to whom the allegations are directed must determine only the legal sufficiency of the motion, not the truth or falsity of the statements. *See* Fla. R. Jud. Admin. 2.330(f); *see also In re Cohen*, 99 So. 3d 926 (Fla. 2012); *Taylor v. State*, 557 So. 2d 138 (Fla. 1st DCA 1990), *disapproved on other grounds*, 687 So. 2d 823 (Fla. 1996); *Deren v. Williams*, 521 So. 2d 150 (Fla. 5th DCA 1988) (cited in Hurley & Antoon, "Disqualification of a Judge," Ethics Outside the Courtroom (Florida Judiciary Education 1996)); *Tower Group, Inc. v. Doral Enterprises Joint Ventures*, 760 So. 2d 256 (Fla. 3d DCA 2000); *Kielbania v. Jasberg*, 744 So. 2d 1027 (Fla. 4th DCA 1997); *Leveritt & Associates, P.A. v. Williamson*, 698 So. 2d 1316 (Fla. 2d DCA 1997); *Nathanson v. Nathanson*, 693 So. 2d 1061 (Fla. 4th DCA 1997).

Not only must the judge determine only the legal sufficiency of the motions, but the judge must do so quickly. According to rule 2.330(f), the decision regarding legal sufficiency must be made immediately. In fact, in response to *Tableau Fine Art Group, Inc. v. Jacoboni*, 853 So. 2d 299 (Fla. 2003), the supreme court added subdivision (j) to rule 2.330 (then 2.160), which provides that the judge must rule on the motion to disqualify within 30 days of service of the motion on the judge. *Amendments to Florida Rule of Judicial Administration 2.160*, 885 So. 2d 870 (Fla. 2004).

A judge may preside over an attorney's cases with automatic recusal not necessary, when the judge had accepted a weekend vacation trip from the attorney about eight years prior; however, the judge must disclose the record of a prior standing recusal order and the judge's relationship with the attorney. Opinion 09-01.

4. What Is "Personal Bias" or "Prejudice"?

The terms "personal bias" or "prejudice" relate to allegations of a judge's particularized ill will or animosity toward a specific person in a case. These terms are not synonymous with racial, ethnic, or other status-based bias or prejudice, which is the subject of Canon 3B(5). One commentator has observed that personal bias or prejudice is more difficult to determine than other forms of partiality, such

as established personal relationships, professional associations, or business interests. Abramson, *Judicial Disqualification Under Canon 3 of the Code of Judicial Conduct 23* (American Judicature Society 1992). These sources of partiality are susceptible of a more objective definition than personal bias, prejudice, or dislike. *See generally* ALFINI , LUBET, SHAMAN & GEYH, JUDICIAL CONDUCT AND ETHICS § 4.05 (LexisNexis/Matthew Bender 4th ed. 2007, 2010 supp.). This is an area in which the legal and ethical requirements overlap. Not only does Canon 3E(1)(a) mandate judicial disqualification when the judge holds a personal bias or prejudice against a party or counsel, but section 38.10, Florida Statutes, states that a party may move for disqualification of a judge when the party fears an unfair trial because the judge personally dislikes the party or favors the party's opponent. *See*, *e.g.*, *Robbins v. Robbins*, 742 So. 2d 395 (Fla. 2d DCA 1999) (judge should have recused because of personal friendship with one spouse in divorce proceeding); Opinion 99-02 (committee advised judge to recuse when dating one of attorneys in case assigned to that judge).

5. Does Personal Bias or Prejudice Include All Preconceived Notions or Preformed Ideas About Law or Issues in Case?

The kind of bias or prejudice prohibited by Canon 3E is personal. A judge can have general opinions about legal or social issues involved in a case without harboring personal animosity against a party, witness, or attorney involved in the matter.

In addition, there is authority to support the notion that personal bias or prejudice does not even include personal opinions about a party, witness, or attorney formed during the case. The "extrajudicial source rule" suggests that bias or prejudice caused by events that occur during the court proceeding is not a basis for disqualification. ALFINI, LUBET, SHAMAN & GEYH, JUDICIAL CONDUCT AND ETHICS 4.17 (LexisNexis/Matthew Bender 4th ed. 2007, 2010 supp.) (discussing extrajudicial source rule extensively and citing *U.S. v. International Business Machines Corp.*, 475 F. Supp. 1372 (S.D. N.Y. 1979), *affirmed*, 618 F.2d 923 (2d Cir. 1980); *U.S. v. Grinnell Corp.*, 384 U.S. 563, 86 S.Ct. 1698, 16 L.Ed.2d 778 (1966)). The authors in ALFINI suggest that "[t]o require recusal, bias or prejudice normally must be rooted in an extrajudicial source" and state as follows:

> . . . A judge must be able to preside over court proceedings, and it is only natural (and probably unavoidable) that judges will react to the behavior of litigants and attorneys.
>
> As courts have applied the extrajudicial source rule, a judge

> will not be disqualified from rehearing a case that has been remanded by an appellate court to correct errors that the judge previously made. Nor is it improper for a judge to hear and decide a case in which he previously heard a plea bargain that was later withdrawn. That a judge presided in a previous criminal trial is generally not grounds for disqualification in a subsequent trial involving the same defendant, because the source of any opinion the judge might hold about the defendant is not extrajudicial. In fact, one case goes so far as to take this position even though in the earlier trial involving the same defendant, the judge expressed strong disapproval of the defendant's behavior. Because the source of the judge's opinion was not extrajudicial, it was ruled that recusal was not necessary

Id. (citing *U.S. v. Hollis,* 718 F.2d 277 (8th Cir. 1983), *cert. denied*, 465 U.S. 1036 (1984); *State v. Aubert*, 393 A.2d 567 (N.H. 1978); *Lena v. Com.*, 340 N.E.2d 884 (Mass. 1976); *Commonwealth v. Dane Entertainment Services, Inc.*, 467 N.E.2d 222 (Mass. 1984)).

The "extrajudicial source rule," as defined by Shaman, has rarely been mentioned specifically by a Florida court (*see, e.g.*, *Michaud-Berger v. Hurley*, 607 So. 2d 441 (Fla. 4th DCA 1992), which is not especially helpful because the reference occurs in an excerpt from the trial judge's order denying the plaintiff's motion for disqualification, which the appellate court ultimately reversed). Moreover, the United States Supreme Court rejected the rule in *Liteky v. U.S.*, 510 U.S. 540, 114 S.Ct. 1147, 127 L.Ed.2d 474 (1994). Justice Scalia, writing for the court, held that although a judge must be able to form judgments of the actors, and may develop opinions of parties and witnesses during a proceeding, there cannot be the "complete dichotomy between court-acquired and extrinsically acquired bias" that a blanket extrajudicial source rule implies. 510 U.S. at 550. Nonetheless, despite its abrogation of an absolute rule, the court observed:

> First, judicial rulings alone almost never constitute [a] valid basis for a [motion to disqualify]. . . . Second, opinions formed by the judge on the basis of facts introduced or events occurring in the course of the current proceedings, or of prior proceedings, do not constitute a basis for a [motion to disqualify] unless they display a deep-seated favoritism or antagonism that would make fair judgment impossible.

510 U.S. 540 at 555.

This language from *Liteky* is consistent with Florida case law interpreting Canon 3

and the need to disqualify. *Mansfield v. State*, 911 So. 2d 1160 (Fla. 2005); *Gilliam v. State*, 582 So. 2d 610 (Fla. 1991) (mere adverse ruling insufficient ground for disqualification); *Thompson v. State*, 759 So. 2d 650, 659 (Fla. 2000) ("the fact that a judge has ruled adverse to a party does not constitute a legally sufficient ground for a motion to disqualify"); *Williams v. State*, 689 So. 2d 393, 396 (Fla. 3d DCA 1997) ("a judge's adverse ruling may not serve as a sufficient basis for recusal"); *Jones v. State*, 69 So. 3d 329 (Fla. 4th DCA 2011); *but see Olszewska v. Ferro*, 590 So. 2d 11 (Fla. 3d DCA 1991) (finding sufficient grounds for disqualification when judge "leaves the realm of civility and directs base vernacular towards an attorney or litigant in open court").

While no judge is expected to come to a case as a blank slate, some preformed ideas can disqualify a judge, and there is case law that illustrates when such ideas can be disqualifying. "While it is well-settled that a judge may form mental impressions and opinions during the course of hearing evidence, he or she may not prejudge the case." *Barnett v. Barnett*, 727 So. 2d 311, 312 (Fla. 2d DCA 1999), referencing *Wargo v. Wargo*, 669 So. 2d 1123 (Fla. 4th DCA 1996), and *LeBruno Aluminum Co. v. Lane*, 436 So. 2d 1039 (Fla. 1st DCA 1983); *see also Zanghi v. State*, 61 So. 3d 1263 (Fla. 4th DCA 2011). The scope of Canon 3E is best defined by examining the cases and committee opinions interpreting Canon 3E and former Canon 3C. The commentary to Canon 3E reads in part:

> A judge should disclose on the record information that the judge believes the parties or their lawyers might consider relevant to the question of disqualification, even if the judge believes there is no real basis for disqualification.

In *In re Code of Judicial Conduct*, 659 So. 2d 692, 693 (Fla. 1995), the Florida Supreme Court added the following language to the above-quoted part of the commentary:

> The fact that the judge conveys this information does not automatically require the judge to be disqualified upon a request by either party, but the issue should be resolved on a case-by-case basis. Similarly, if a lawyer or party has previously filed a complaint against the judge with the Judicial Qualifications Commission, that fact does not automatically require disqualification of the judge. Such disqualification should also be on a case-by-case basis.

The fact that the judge is a defendant in a similar type of proceeding does not necessarily require recusal. Opinion 12-09 (judge who, with spouse, was

defendant in residential condominium foreclosure action, need not recuse self from all residential foreclosure proceedings; however, while judge is defendant in foreclosure litigation "and for a reasonable time thereafter," judge must disclose fact to all such litigants because although judge's "impartiality may not be reasonably questioned . . . the judge's ruling on an issue in foreclosure cases before the judge reasonably could be perceived as providing the judge with persuasive authority in the judge's favor, or some other advantage, in the judge's own case"). In Opinion 15-14, the committee stated that a judge who was a defendant in a mortgage foreclosure proceeding five years earlier need not recuse from all pending mortgage foreclosure cases, or from all cases involving lawyers, lenders, or assignees involved in the judge's residential mortgage foreclosure cases. Nor is disclosure required. But disclosure is prudent "[u]ntil no reasonable person would consider the information relevant to a determination of the judge's impartiality," and recusal is prudent if the judge has a personal bias or prejudice.

6. Are There Times When Judge's Public Expressions of Opinion or Sentiment Are Disqualifying?

In one case, a judge who had publicly expressed sympathy for persons with cerebral palsy was required to recuse in a medical malpractice lawsuit involving a child with cerebral palsy. *Deren v. Williams*, 521 So. 2d 150 (Fla. 5th DCA 1988). In another case, a judge's public statements about speedy imposition of death sentences were published in a newspaper, and the Florida Supreme Court deemed those statements a sufficient basis for recusal in a death penalty case. *Suarez v. Dugger*, 527 So. 2d 190 (Fla. 1988). In *Roy v. Roy*, 687 So. 2d 956 (Fla. 5th DCA 1997), the trial judge referred to one of the parties as "Mr. Deadbeat Man of the Year" before any evidence was taken. The party moved for disqualification, and the judge denied the motion and ultimately ruled against the party on the merits. The district court of appeal overturned the decision. *But see Doorbal v. State*, 983 So. 2d 464 (Fla. 2008) (judge's testimony on behalf of defendant's victims in Medicare fraud trial insufficient for disqualification of judge in defendant's postconviction proceeding); *Waterhouse v. State*, 792 So. 2d 1176, 1192 (Fla. 2001) (judge's comments to Parole and Probation Commission that party was "a dangerous and sick man and that many other women have probably suffered because of him" was not deemed to be prejudicial comment warranting disqualification, as party admitted having "problem with sex and violence" and had been charged with two brutal murders and sexual assaults of women).

Also, in *In re Gridley*, 417 So. 2d 950 (Fla. 1982), although disqualification was not the issue, the judge announced strongly held religious beliefs in opposition to the death penalty and wrote a series of letters to the editor to a local newspaper. In this 4-3 Florida Supreme Court opinion, the judge was not disciplined because in every instance he said he would uphold his constitutional responsibility to follow the law. Three dissenting members of the court did believe, however, that Gridley should have been disciplined because he had thrown his impartiality into question and made it reasonable to believe that he would have difficulty imposing a death sentence. In *Royal Caribbean Cruises, Ltd. v. Doe*, 767 So. 2d 626 (Fla. 3d DCA 2000), the appellate court said that a judge's statements about the cruise line industry and its failure to safeguard its passengers and perform timely discovery should have been disqualifying. The facts were also held sufficient to require disqualification in *Valdes-Fauli v. Valdes-Fauli*, 903 So. 2d 214, 217 (Fla. 3d DCA 2005) (trial judge called wife in dissolution case "a 'woman scorned,' stating that '[Hell] hath no fury like a woman scorned' [and] told her that her feelings were 'very typical' and that it explained her 'motivation,' presumably for requesting permanent alimony, suggesting a pre-existing unfavorable opinion of women seeking permanent alimony out of anger").

There are also instances in which a judge's preformed opinion of a witness's credibility must result in disqualification. *See St. George Island, Ltd. v. Rudd*, 547 So. 2d 958 (Fla. 1st DCA 1989), *approved*, 561 So. 2d 253 (Fla. 1990).

Comments to the press about a pending case warranted judge's disqualification. *See Novartis Pharmaceuticals Corp. v. Carnoto*, 840 So. 2d 410 (Fla. 4th DCA 2003).

7. When Does Manifestation of Personal Bias or Prejudice Against Attorney Disqualify Judge?

A judge is disqualified when personal bias against an attorney adversely affects the client. *Livingston v. State*, 441 So. 2d 1083, 1087 (Fla. 1983) ("Prejudice against a party's attorney can be as detrimental to the interests of that party as prejudice against the party himself. What is important is the party's reasonable belief concerning his or her ability to obtain a fair trial"); *Hayslip v. Douglas*, 400 So. 2d 553 (Fla. 4th DCA 1981). Not until the 1995 revision did Canon 3 expressly include counsel among those against whom a personal bias could warrant disqualification of the judge. Yet there has long been case law applying this portion of the canon to manifestations of bias against attorneys. *See*, *e.g.*, *Ginsberg v. Holt*, 86 So. 2d 650 (Fla. 1956); *Edwards-Freeman v. State*, 138 So. 3d 507 (Fla. 4th DCA 2014).

When a judge harbors animosity toward a particular attorney or when a disagreement with an attorney interferes with the court's impartiality, this creates a basis for disqualification. *Jimenez v. Ratine*, 954 So. 2d 706 (Fla. 2d DCA 2007); *Robinson v. Tobin*, 547 So. 2d 714 (Fla. 3d DCA 1989); *Cardinal v. Wendy's of South Florida, Inc.*, 529 So. 2d 335 (Fla. 4th DCA 1988). In *Gates v. State*, 784 So. 2d 1235, 1236 (Fla. 2d DCA 2001), the appellate court overturned a conviction for second degree murder because the trial judge denied a proper motion to disqualify. The trial judge became increasingly "frustrated with what she perceived as incompetence" by one of the defense attorneys, reprimanded the attorneys loudly in front of the jury and at side bar, and threatened to castigate counsel in open court. In *Marshall v. Bookstein*, 789 So. 2d 455, 456 (Fla. 4th DCA 2001), the appellate court held that a judge improperly denied a motion for disqualification when the judge, during a calendar hearing, "angrily denounc[ed] [petitioners' attorneys'] 'tactics' and derid[ed] them as substandard 'Miami Lawyers,'" who "may get away with it in Miami, but not up here." Not only does a manifestation of animosity cause a judge to risk disqualification, but it can result in reversal on the merits with serious legal consequences. In *In re Yacucci*, 228 So. 3d 523 (Fla. 2017), a judge was suspended for 30 days without pay and ordered to complete a judicial ethics course and pay JQC costs, based on an acrimonious relationship between the judge and an attorney "marked by lawsuits, a public altercation and televised disparagement, the jailing of [the attorney] for contempt, judicial campaign disputes, unsolicited attempts to influence a petition for writ of prohibition, and multiple refusals to disqualify himself."

Because personal bias against attorneys is now expressly prohibited in Canon 3, the potential for disqualification arguably might become greater than previous cases have indicated. However, former Canon 3A(3) (now 3B(4)) has always provided a basis for disqualification when a judge's conduct is undignified or discourteous to anyone appearing before the court. A Canon 3E disqualification may be triggered by a violation of this more general Canon 3 admonition for judges to "be patient, dignified, and courteous to litigants, . . . lawyers, and others with whom the judge deals in an official capacity." Canon 3B(4); *see Olszewska v. Ferro*, 590 So. 2d 11 (Fla. 3d DCA 1991); *Gates v. State*, 784 So. 2d at 1236. When the trial judge "leaves the realm of civility and directs base vernacular towards an attorney or litigant in open court, there are sufficient grounds to require disqualification." *Olszewska*, 590 So. 2d at 11 (citing *Lamendola v. Grossman*, 439 So. 2d 960 (Fla. 3d DCA 1983); *Brown v. Rowe*, 96 Fla. 289, 118 So. 9 (1928)). Thus, although the 1994 revisions to Canon 3 appeared to extend protection from perceived bias to counsel for the first time, case law has long provided such protection. It is important to remember, nonetheless, that not every verbal

altercation with an attorney requires disqualification; the altercation must be serious enough that it is reasonable to believe the judge's animosity will adversely affect the client. *See Ginsberg v. Holt*, 86 So. 2d 650 (Fla. 1956).

8. What If Source of Conflict Between Judge and Attorney Is Unrelated to Case in Which Disqualification Is Sought?

Animosity between a judge and an attorney can require disqualification even if it is unrelated to the case in which disqualification is sought. In *Town Centre of Islamorada, Inc. v. Overby*, 592 So. 2d 774 (Fla. 3d DCA 1992), the court held that a dispute between counsel and the judge approximately eleven months before the clients filed their lawsuit was sufficient to warrant disqualification. In this case, an attorney announced at a local bar association luncheon that he planned to sue the clerk of the court and all of the judges in the circuit challenging a local rule requiring that notice of hearing be filed with each motion. Several days later, at a court hearing, Judge Overby stated that he would make no rulings in cases involving that attorney's law firm because the chief judge had imposed a stay in the firm's cases until an ethics committee issued an opinion about the propriety of the attorney's bar luncheon remarks. An altercation ensued in which the judge stated that he "did not consider a threat of a lawsuit to be friendly and that the remark might warrant disciplinary measures by the Florida Bar." *Id*. at 775. Based on these incidents, the attorney's law firm filed motions for disqualification in three cases before the judge; all of the motions were denied as untimely and legally insufficient. The appellate court reversed the judge in two of the cases, holding that the dispute, although unrelated to those cases, merited disqualification. In the third case, the district court affirmed the judge's denial of the motion to disqualify because the attorney had accepted the case as local co-counsel with knowledge that the case already had been assigned to Judge Overby.

Moreover, a judge currently represented by an attorney must automatically disqualify himself or herself whenever the attorneys or members of his or her firm appear before the judge even if the matter is uncontested, such as a default mortgage foreclosure or an uncontested dissolution of marriage. Opinion 99-13.

9. Must Judge Recuse When Judge Has Reported Party's Attorney to The Florida Bar?

In *Town Centre of Islamorada, Inc. v. Overby*, 592 So. 2d 774 (Fla. 3d DCA 1992), discussed above, Judge Overby had stated that the attorney's conduct might merit discipline; there is no indication that Judge Overby formally filed a grievance. Even if he had filed a grievance, under current case law, that fact alone

would not be sufficient to require recusal. However, the judge must disclose to parties in a pending case, through their respective counsel, that the judge has reported an attorney in the case to The Florida Bar as a result of alleged misconduct by the attorney in the same case. Opinion 2018-18, Opinion 05-16. In *5-H Corp. v. Padovano*, 708 So. 2d 244, 248 (Fla. 1997), the court held that "a Florida judge's mere reporting of perceived attorney unprofessionalism to The Florida Bar, in and of itself, is legally insufficient to support judicial disqualification." The court noted that other states, including Hawaii and Indiana, had reached this same result. In *Padovano*, an attorney filed a motion for a rehearing, arguing that the panel had favored opposing counsel, and he referred to the arguments using profanity and claiming that "a Miami lawyer cannot simply get a fair shake up North." *Id.* at 245. The panel denied the motion and referred the motion to The Florida Bar as inappropriate. The attorney whose conduct was reported to the Bar then filed a motion to disqualify all sitting judges in the First District Court of Appeal, leading to this decision. *See also Birotte v. State*, 795 So. 2d 112 (Fla. 4th DCA 2001).

When a party makes such allegations in a motion to disqualify, it is important for the judge to remember that in evaluating the legal sufficiency of the motion, the judge may determine only whether the facts alleged, presumed to be true, would make a reasonable person doubt that he or she would receive a fair and impartial trial before the named judge. Fla. R. Jud. Admin. 2.330(f); § 38.10, Fla. Stat.; *see also Fischer v. Knuck*, 497 So. 2d 240 (Fla. 1986); *Taylor v. State*, 557 So. 2d 138 (Fla. 1st DCA 1990), *disapproved on other grounds*, 687 So. 2d 823 (Fla. 1996); *Deren v. Williams*, 521 So. 2d 150 (Fla. 5th DCA1988). A mere claim that the judge made defamatory remarks, without specifying what the remarks were, does not mandate disqualification. *See Heier v. Fleet*, 642 So. 2d 669 (Fla. 4th DCA 1994) (petitioner's allegation lacking in specificity and going almost entirely to judicial rulings). In *Heier*, although the petitioner alleged that defamatory remarks were made by the judge, the petitioner failed to state what remarks the judge had made and was not sufficiently explicit about the circumstances in which they were made. Had the allegations been specific, disqualification probably would have been required, irrespective of the veracity of the remarks. *See* Fla. R. Jud. Admin. 2.330(d); § 38.10, Fla. Stat.; *Barnhill v. State*, 834 So. 2d 836 (Fla. 2002) (as in *Heier*, petitioner's affidavit did not state specific facts that led petitioner to believe he would not receive fair trial).

10. Must Judge Be Disqualified When Attorney Previously Has Tried to Have Judge Impeached or Has Filed JQC Complaint Against Judge?

The short answer is that the mere reporting alone does not automatically require disqualification. However, the answer is more complicated than that. In *Brewton v. Kelly*, 166 So. 2d 834 (Fla. 2d DCA 1964), the judge was disqualified because the attorney had testified against the judge in an impeachment proceeding and opposing counsel had testified in the judge's favor. Similarly, in a case in which a judge had issued an order to show cause why an attorney should not be held in contempt in another case, and the attorney's firm had filed a JQC complaint against the judge, the Fourth District Court of Appeal held that the judge should have recused himself upon the attorney's motion to disqualify. *Levine v. State*, 650 So. 2d 666 (Fla. 4th DCA 1995). However, depending on what additional facts might be present, *Brewton* and *Levine* might be decided much differently now in light of *5-H Corp. v. Padovano* discussed previously. *5-H Corp. v. Padovano*, 708 So. 2d 244 (Fla. 1997). In *Padovano*, the Florida Supreme Court also held that "mere report of . . . perceived judicial unprofessionalism to the JQC" does not in and of itself support judicial disqualification. *Id.* at 248. The court in *Padovano* excluded from its ruling cases that involved more than just a complaint to the JQC, including *Levine*.

Even before the Florida Supreme Court's express ruling in *Padovano*, the Florida Judicial Ethics Advisory Committee came to the same conclusion when the question was asked of it. Opinion 95-20 (expressing unanimous opinion that judge should disqualify self "under the facts presented," but disagreeing on whether disqualification should be "automatic" or "case-by-case"). The *Padovano* case clarifies that recusal under these circumstances should not be automatic but must be determined case-by-case.

11. Is Recusal Required When Lawyer Appearing Before Judge Has Voiced Opposition to Judge's Election?

There is a presumption that a judge will not harbor personal bias or prejudice against a lawyer who opposes the judge's election or re-election. However, when a motion to disqualify alleges that the presiding judge delivered a "tirade" to the moving attorney about the lack of support, the presumption is rebutted. *McDermott v. Grossman*, 429 So. 2d 393, 394 (Fla. 3d DCA 1983).

While recusal may be the safest course, an allegation that a party or attorney has made a legal campaign contribution to the political campaign of the trial judge or the trial judge's spouse, without more, is not a legally sufficient ground for disqualification. *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990); *E.I. DuPont de Nemours & Co. v. Aquamar S.A.*, 24 So. 3d 585 (Fla. 4th DCA 2009) (court distinguished case from *Caperton v. A.T. Massey Coal Co.*,

556 U.S. 868, 129 S.Ct. 2252, 173 L.Ed.2d 1208 (2009), in which $3 million donation to judicial campaign required recusal).

Furthermore, allegations that the judge was biased against a party's attorney because the attorney did not contribute to the judge's campaign fund, and instead supported the judge's opponent, have been ruled legally insufficient to disqualify a judge. *Paul v. Nichols*, 627 So. 2d 122 (Fla. 5th DCA 1993). However, when a sitting judge campaigning for re-election is supported by the state attorney, the sheriff, and defense lawyers, the judge should announce these relationships in open court in addition to issuing a mass mailing containing disclosure. Opinion 08-02 (Election). Disqualification is not automatic when the attorney before a judge is a member of the judge's campaign committee. Opinion 03-22. Judge is disqualified from presiding over a case in which the law partner and campaign treasurer of an attorney who has qualified to run against the judge is an attorney for one of the parties. Opinion 11-08.

A judge need not recuse merely because an attorney who regularly appears before the judge is considering running against the judge, but the judge may not ask the attorney directly whether he or she intends to run. Opinion 18-03.

12. Personal Knowledge: When Does Judge's Personal Knowledge of Disputed Facts Require Disqualification?

Canon 3E(1)(a) requires disqualification when a judge has personal knowledge of disputed facts in a case. There are several Florida cases dealing specifically with the personal knowledge issue. In *Walton v. State*, 481 So. 2d 1197 (Fla. 1986), *cert. denied*, 493 U.S. 1036, 110 S.Ct. 759, 107 L.Ed.2d 775 (1990), the court held that a judge need not automatically recuse himself in a defendant's trial after hearing the co-defendant's case. The appellant's argument was that the judge's impartiality was impaired by a co-defendant's defense strategy based on the appellant's culpability. The appellant contended that because the trial judge presided at the co-defendant's trial and was exposed to evidence that inculpated the appellant, the trial judge should be disqualified because he might be "psychologically predisposed" to reject the appellant's defense that his co-defendants were responsible for the crime. The court rejected this argument, noting that the same degree of knowledge could have come from pretrial hearings or discovery in this co-defendant's case. The court determined that the appellant's assertion did not set forth a "well-grounded fear," and the motion for disqualification failed "to show the personal bias or prejudice on the part of the trial judge necessary for disqualification." 481 So. 2d at 1199.

In *Mackey v. State*, 234 So. 2d 418 (Fla. 3d DCA 1970), *receded from on other grounds*, 252 So. 2d 842, the appellate court ordered a new trial of two co-defendants tried together after one of the defendants made an unsworn statement to the court in which he implicated the co-defendant in the robbery in question. Although the defendant was entitled to a new trial with a new judge, *Mackey* was not a Canon 3E case. In fact, the court stated: "This is not an instance of bias of the trial judge. It is to be assumed that the judge was not biased, and that he conscientiously attempted to act fairly in the case." 234 So. 2d at 420. Therefore, there were no Canon 3 ethical consequences for the judge. The distinction between *Mackey* and *Walton*, *supra*, may have been that in *Mackey*, the defendant made a direct unsworn statement to the court regarding the robbery. The statement was not part of the record, unlike the defendant's statements in *Walton*.

Not only may the same judge preside over separate trials of two co-defendants for the same crime, but a judge may preside over several proceedings involving the same defendant. *K.H. v. State, Dept. of Health & Rehabilitative Services*, 527 So. 2d 230 (Fla. 1st DCA 1988). In that case, the appellant sought to disqualify the judge, who had presided over several hearings involving the removal of the appellant's child from her custody. Because the child had spent 24 months of his 36-month life in the custody of the Department of Health and Rehabilitative Services (HRS) by virtue of the judge's rulings, the appellant feared that the judge would be predisposed in favor of HRS in the hearing for permanent placement. In affirming the trial court's denial of the motion to disqualify, the district court stated: "The rule is well-established that adverse judicial rulings do not constitute sufficient grounds to disqualify a judge." *See also Ardis v. Ardis*, 130 So. 3d 791, 795 (Fla. 1st DCA 2014) ("the fact that a judge may have familiarity with the parties and evidence from earlier proceedings does not warrant disqualification"); *Jenkins v. C.A.J.*, 434 So. 2d 9 (Fla. 1st DCA 1983) (finding it significant that there was nothing in record to indicate trial judge favored permanent commitment before actual commitment hearing).

In *Fabber v. Wessel*, 604 So. 2d 533 (Fla. 4th DCA 1992), the judge saw privileged mediation communications. The plaintiff, feeling she might be prejudiced based on the disclosure of those communications alone, requested disqualification. She cited no particular prejudice apart from the disclosure itself but argued that the mere act of disclosure violated the mediation statute in question, section 44.102(3), Florida Statutes. The judge refused to disqualify himself. The plaintiff then filed a motion for a writ of prohibition in the Fourth District Court of Appeal. The district court granted the writ of prohibition requiring the judge to disqualify himself.

Fabber is no longer good law, at least if cited for the proposition that an allegation that the judge has seen privileged mediation documents is sufficient to warrant recusal. In fact, the decision in *Fabber* has been expressly repudiated in *Enterprise Leasing Co. v. Jones*, 789 So. 2d 964 (Fla. 2001). There the Florida Supreme Court specifically disapproved of *Fabber* and held that the disclosure of confidential mediation information to the trial judge, in and of itself, is not sufficient for disqualification. The facts were similar to *Fabber* in that the judge learned of the settlement offers made during mediation. The court found that the statute used to disqualify the judge in *Fabber*, section 44.102(3), Florida Statutes, does not give rise to a per se rule requiring confidentiality, only a privilege to refuse to disclose the information.

Even though *Fabber* has been overruled, it is nonetheless relevant to this discussion because it illustrates the importance of ruling on legal sufficiency and not commenting on the truth or falsity of the claims in the motion. A significant component of the court's decision in *Fabber* included a discussion of the fact that the judge took exception to the accuracy of facts stated in the motion to disqualify. The court stated that the response created "'an intolerable adversary atmosphere between the trial judge and the litigant.'. . . On that ground alone, we are obliged to grant the writ" of prohibition. Although the district court stated that it was not holding that "any response filed by a judge in a prohibition-disqualification proceeding is per se disqualifying," it determined that it is "decidedly dangerous for the judge" to so respond. 604 So. 2d at 534. This part of the *Fabber* opinion, cautioning against addressing the truth or falsity of the allegations in the motion, is still valid.

In Opinion 14-02, the committee stated that a judge may not preside in a case in which that judge had provided mediation services while still in a law practice. A judge may, however, preside in a case in which the judge had provided one of the party's attorneys mediation services in the past, if the judge's impartiality would not be reasonably questioned.

In short, it appears that disqualification is required of a judge when he or she has personal knowledge of evidentiary facts learned through some means outside the record or unobtainable from some general knowledge or source. Clearly, a judge may preside over the trial of a co-defendant even though the judge heard all of the evidence at the other defendant's trial that implicated the co-defendant. *Dragovich v. State*, 492 So. 2d 350 (Fla. 1986); *see also Mansfield v. State*, 911 So. 2d 1160 (Fla. 2005) (statements made by trial judge to counsel, outside jury's presence, during penalty phase did not preclude him from presiding over sentencing

proceeding). Moreover, it is clear that a judge can make limited comments about the evidence. *See Moser v. Coleman*, 460 So. 2d 385 (Fla. 5th DCA 1984) (proper for judge to hear second probation violation after dismissing first warrant on basis of "sloppy pleading" and after stating "[t]he evidence is clear . . . that the Defendant committed the subsequent offense"). What a judge must never do is comment on the accuracy of the facts stated in a litigant's motion to disqualify. This will require disqualification on legal grounds.

13. Prior Service: Does Judge's Prior Service as Lawyer, Lower Court Judge, or Witness Require Disqualification?

Canon 3E(1)(b) requires disqualification if the judge's impartiality might reasonably be questioned. There are a number of cases in which prior participation in a cause has been ruled a reasonable basis to require disqualification. In *Roberts v. State*, 161 So. 2d 877 (Fla. 2d DCA 1964), a judge who had appeared as counsel of record in a lawsuit before becoming a judge was disqualified from handling the case even though a new attorney had taken over the representation and the judge had no personal knowledge regarding that representation. The judge previously had served as county solicitor and originally filed the information against the defendant. The judge's lack of recollection about the filing was irrelevant.

Prior participation in a cause is disqualifying even if the case before the court involves matters only supplemental to enforcement or avoidance of an earlier decree. *See State ex rel. Ambler v. Hocker*, 34 Fla. 25, 15 So. 581 (1894); *Hewitt v. State*, 839 So. 2d 763 (Fla. 4th DCA 2003) (prior participation also disqualifying when judge was counsel for husband in divorce proceeding seven years prior to tax evasion case currently involving former wife).

Nothing in Canon 3E(1)(b), however, should be construed to preclude a judge from presiding over the rehearing of the judge's own decision. *See Edwards v. U. S.*, 334 F.2d 360 (5th Cir. 1964), *cert. denied*, 379 U.S. 1000, 85 S.Ct. 721, 13 L.Ed.2d 702 (1965) (stating that judges sit as matter of course on rehearing of their own decisions). Likewise, automatic disqualification is not required even when a judge has witnessed a defendant's act of indirect criminal contempt and may be called as a witness in the contempt proceeding. *Hope v. State*, 449 So. 2d 1315 (Fla. 2d DCA 1984). When a judge is going to give testimony that will affect the merits of the cause and about which no other witness will testify, the judge is a material witness and must disqualify himself or herself. *Wingate v. Mach*, 117 Fla. 104, 157 So. 421 (1934); *see also* Fla. R. Jud. Admin. 2.330(d)(2).

Moreover, a judge is not automatically disqualified from a case simply because,

while an attorney, the judge represented one of the parties in a matter other than the one currently before the court, unless the earlier representation involved giving advice about the legal effect of an instrument now in controversy. *Tampa St. Ry. & Power Co. v. Tampa Suburban R. Co.*, 11 So. 562 (Fla. 1892); *Perona v. Fort Pierce/Port St. Lucie Tribune*, 763 So. 2d 1188 (Fla. 4th DCA 2000). *But see Hewitt v. State*, 839 So. 2d 763 (Fla. 4th DCA 2003); *see also* Opinion 12-08 and Opinion 17-17 (recusal not required unless past representation affected judge's ability to be fair, but judge should disclose past representation to parties and lawyers).

There is, however, an exception regarding government agencies in the commentary to Canon 3E(1)(b), which states:

> A lawyer in a government agency does not ordinarily have an association with other lawyers employed by that agency within the meaning of Section 3E(1)(b); a judge formerly employed by a government agency, however, should disqualify himself or herself in a proceeding if the judge's impartiality might reasonably be questioned because of such association.

Therefore, the intent is clear to hold to a higher standard judges who come from prior government service. This would include prosecutors who later become judges. *See, e.g.*, *Fischer v. Knuck*, 497 So. 2d 240 (Fla. 1986), *cited by W.I. v. State*, 696 So. 2d 457, 458 (Fla. 4th DCA 1997) ("While the fact that the presiding judge prosecuted petitioner in a previous case does not present a direct conflict of interest, it does support petitioner's claim of a well founded fear that he will not receive a fair trial before this judge"); *see also Goines v. State*, 708 So. 2d 656 (Fla. 4th DCA 1998). In *Dendy v. State*, 954 So. 2d 1221 (Fla. 4th DCA 2007), the trial judge was a former federal prosecutor to whom a letter from the assistant state attorney had been addressed in the case, regarding assistance in issuing a warrant for a witness. The appellate court held the judge need not be disqualified as "the letter was addressed to her only because of her supervisory role in the U.S. Attorney's Office at that time [and] her involvement, if any, would have been limited to the administrative task of assigning the routine request to an assistant U.S. Attorney; she would not have seen the letter nor assisted in obtaining the . . . warrant." *Id.* at 1223. The court held that "the facts alleged would not create in a reasonably prudent person a well-founded fear of not receiving a fair and impartial trial. In so holding, we distinguish this case from those wherein the judge is alleged to have been actually involved in the prosecution of the defendants moving for disqualification." *Id.* at 1225.

14. When Is Economic Interest Disqualifying?

An economic interest can be disqualifying under both Canon 3E(1)(c) and section 38.02, Florida Statutes. The interest must be direct and immediate and not uncertain or speculative. *See State ex rel. Cannon v. Churchwell*, 195 So. 2d 599 (Fla. 4th DCA 1967). If the judge, individually or as a fiduciary, or the judge's spouse, parent, child, or any other member of the judge's family residing in the judge's household, has an "economic interest" in the subject matter of the case or a party to the case or has more than a de minimis interest that could be "substantially affected," the judge must disqualify himself or herself. Both "economic interest" and "de minimis" are defined in the Definitions section following the Preamble to the Code of Judicial Conduct. Economic interest, according to the code, means "ownership of a more than de minimis legal or equitable interest, or a relationship as officer, director, advisor, or other active participant in the affairs of a party." According to the definition, there are four specific exceptions.

First, "ownership of an interest in a mutual fund or a common investment fund that holds securities is not an economic interest for purposes of the canon unless the judge participates in the management of the fund," or, in some matter pending or impending before the judge, he or she might be called on to make a decision that would substantially affect the value of the interest.

The second exception to the economic interest definition involves a judge's service as "an officer, director, advisor, or other active participant in an educational, religious, charitable, fraternal, sororal, or civic organization." For a judge or a member of the judge's family to serve in such a capacity does not create an economic interest in any securities that the organization might hold.

The third exception involves deposits in a variety of financial institutions and proprietary interests as a policyholder in insurance companies. In other words, having an account in a bank or credit union or a proprietary interest in an insurance policy does not constitute an economic interest in the organization unless, in a proceeding pending or impending before the judge, the judge's ruling "could substantially affect the value of the interest."

The fourth exception involves ownership of government securities. These are specifically excluded from the definition of economic interest, and a judge need not worry about disclosure or disqualification unless, in a proceeding pending or impending before the judge, his or her ruling "could substantially affect the value of the securities."

As noted above, even an "economic interest" in a matter may not require disclosure or disqualification if the interest is de minimis. The definitions section of the code defines "de minimis" as "an insignificant interest that could not raise reasonable questions as to a judge's impartiality." How the de minimis standard will be applied in the future is subject to question. Until the adoption of the 1995 canons, the degree or amount of interest was considered immaterial, and the judge was required to disqualify no matter how small the interest. *Skipper v. State*, 153 So. 853 (Fla.), *app. dism.*, 293 U.S. 517, 55 S.Ct. 76, 79 L.Ed. 631 (1934). Former Canon 3C(1) also referred to "financial interest" rather than the new Canon 3E(1) term "economic interest." Financial interest included any legal or equitable interest, however small, or relationship as or to an officer, trustee, director, advisor, or other active participant in the affairs of a party.

Despite the revisions, several committee opinions issued before 1995 still provide useful guidance. Opinion 85-08 states that when a judge and an attorney are in a landlord-tenant or creditor-debtor relationship, the judge should disqualify himself or herself from all cases in which the attorney is counsel of record but still may hear cases involving the attorney's firm. Even before adoption of the 1995 "definitions" section, the committee, in Opinion 85-14, advised an inquiring judge, who owned a minuscule part in a limited partnership, that the judge need not automatically recuse when attorneys who also are involved in the limited partnership come before the court. The committee advised, however, that the judge must be careful to divulge this relationship to parties when necessary. Under Canon 3E(1), the judge would appear to have a de minimis interest in the matter.

Opinion 10-02 states that a judge should disqualify himself or herself from all cases in which the county is a party represented by the county attorney, where the judge is a partner in a building partnership with the county attorney; however, disqualification is not required if the county is represented by independent outside counsel. Opinion 07-10 states that a judge should disqualify himself or herself when lawyers appear who work for a legal aid organization leasing an office building owned by the judge.

Although the code specifically exempts from the definition of "economic interest" a deposit in a financial institution, the decision in *Southeast Bank, N.A. v. Capua*, 584 So. 2d 101 (Fla. 3d DCA 1991), *cause dism. sub nom. Royal Trust Tower, Ltd. v. Southeast Bank, N.A.*, 592 So. 2d 682 (Fla. 1991), merits attention. In that case, a judge was disqualified from presiding over a matter involving Southeast Bank when he was potentially in the identical position as the defendant in a pending case between the defendant and Southeast Bank. The judge had guaranteed a

promissory note to the bank, on which the maker had defaulted. The judge paid only one installment, and no further action was taken by the bank against the judge. The note and the guarantee signed by the defendant in the matter pending before the judge were identical to those the judge had signed. In this instance, the proceeding pending before the judge obviously could substantially affect the judge himself. The judge knew that he had more than a de minimis interest in avoiding liability on a similar guarantee and that a court ruling as to the validity of the guarantee would have an impact on any future actions the bank might pursue against him. Furthermore, the appellate court pointed out that even if the judge believed he could remain entirely impartial, it was not his belief but that of the movant that mattered legally. The court stated that the relationship caused a reasonable fear in the defendant that the defendant could not receive a fair trial before that judge. *See Livingston v. State*, 441 So. 2d 1083 (Fla. 1983). In such a case, it is not a question of how the judge feels but, rather, "what feeling resides in the affiant's mind and the basis for such feeling." *Southeast Bank*, 584 So. 2d at 103.

In Opinion 18-11, the committee advised that a judge may continue to participate in the judge's former law firm's 401(k) retirement plan where the firm does not contribute to the plan or pay the plan's management fees, the account is an individual account and the judge controls the assets in it, and it is managed by an independent investment firm. But the judge must disclose the judge's participation in the firm's 401(k) plan to the attorneys and parties in any case in which members of the judge's former law firm are involved.

In Opinion 14-17, the committee advised that a judge must disclose to all parties the judge's business relationship as landlord to a bank/party. While disqualification would be required, the parties may waive disqualification after proper disclosure.

In Opinion 89-05, the inquiring judge had decided not to preside in any dissolution of marriage or domestic relations cases that required entering an order and enforcing payment of or determining responsibility for payment of a financial obligation of a party to a bank in which the judge owned stock, unless the parties and their attorneys agreed in writing to the judge's presiding. A majority of the committee found the judge's practice to be appropriate and "perhaps the safest" course. One member of the committee found the judge's interest not sufficiently significant to require disclosure in any proceeding in which the bank was not a party and the judge would not be called on to enforce payment of any liability to the bank. Under the revised canon, depending on the size of the ownership interest and the economic consequences to the litigants or the judge, the judge might not

have to disclose the interest at all. As the committee noted, however, it is always safer to disclose. (Opinion 10-25 recedes from Opinion 89-05 to the extent that the judge's decision to disclose required disqualification, noting that "[t]he Code now provides that disclosure does not require disqualification.")

In Opinion 12-09, the judge was a defendant in a residential condominium foreclosure action. The committee found that the judge need not recuse from all residential foreclosure proceedings. However, while the judge is a defendant in the foreclosure litigation "and for a reasonable time thereafter," the judge must disclose that fact to all litigants in residential foreclosure proceedings because, although the judge's "impartiality may not be reasonably questioned . . . the judge's ruling on an issue in foreclosure cases before the judge reasonably could be perceived as providing the judge with persuasive authority in the judge's favor, or some other advantage, in the judge's own case."

Yet, any time a judge discloses, a possible conflict exists. If either of the litigants then moves for disqualification, the judge must comply. *See Pool Water Products, Inc. v. Pools by L.S. Rule*, 612 So. 2d 705 (Fla. 4th DCA 1993). In *Pool Water*, the judge disclosed a potential conflict, which was relied on by a party in a motion to disqualify. The appellate court found the motion to disqualify legally sufficient, stating that "the legally sufficient reason for recusal is that the judge himself thought it was a matter by which his impartiality might reasonably be questioned." 612 So. 2d at 707. *See also* Opinion 00-34 (if firm is making payments to judge under terms of promissory note, disqualification is proper).

15. Must Judge Disqualify Self When Judge or Member of Judge's Family Is Party, Attorney, Financial Interest Holder, or Likely Material Witness in Proceeding, or Lower Court Judge in Decision to Be Reviewed by Judge?

Canon 3E(1)(d) requires a judge to disqualify when the judge or a member of the judge's family is a party, attorney, financial interest holder, or likely material witness in a proceeding. The first step in determining whether disqualification is necessary when a family member is a party, attorney, or material witness is to ascertain "what constitutes a third degree of relationship." In the commentary to former Canon 3C(3)(a), the third degree of relationship test was calculated under the civil law system. According to former Florida Supreme Court Justice Ben F. Overton, *Analysis Concerning the Current and Former Codes of Judicial Conduct* at page 3 (1995 Annual Business Meeting, Florida Conference of Circuit Judges), "It . . . appears that the new code has expanded the definition of third degree of relations." Formerly, third degree of relationship was calculated according to the

"civil law system." *See* former Canon 3C(3)(a).

In the revised code, the "third degree of relationship" is defined in the definition section to include "great-grandparent, grandparent, parent, uncle, aunt, brother, sister, child, grandchild, great-grandchild, nephew, or niece." If any person related to the judge or the judge's spouse within this degree is a party, lawyer, or witness, or has more than a de minimis interest that could be substantially affected by the proceeding, the judge must disqualify himself or herself. *See State ex rel. Caro v. Reese*, 195 So. 918 (Fla. 1940) (automatically disqualifying judge when judge's son was attorney for one of defendants); *Villeneuva v. State*, 127 Fla. 724, 173 So. 906 (1937) (requiring automatic disqualification when judge's sister and brother-in-law were prosecution witnesses in breaking and entering case). *See also Lytle v. Rosado*, 711 So. 2d 213 (Fla. 3d DCA 1998) (judge's stepson was involved in suit with insurance company, and judge had to disqualify himself in separate trial involving same insurance company). Also in *J & J Towing, Inc. v. Stokes*, 789 So. 2d 1196 (Fla. 4th DCA 2001), disqualification was proper based on an allegation that the judge's wife was represented by plaintiff's counsel in a separate pending matter involving her individually and as a school board member. In Opinion 06-27, a judge was advised that disqualification was required when the judge's son's law firm represented a party in a family law case and parties in that case had a child appearing before the judge in a delinquency case. In Opinion 06-26, a judge's disqualification was required when a member of the law firm where judge's son was employed as an attorney appeared in a case before the judge. In *In re Adams*, 932 So. 2d 1025 (Fla. 2006), a judge was publicly reprimanded for a romantic relationship with an attorney appearing before him in a number of cases. In Opinion 08-03, the committee advised that a judge must disqualify himself or herself in cases in which the judge's former fiancé serves as a forensic CPA expert. In Opinion 07-16, the committee advised that a judge is not automatically disqualified in all cases involving a law firm employing the judge's son-in-law as law clerk. In Opinion 07-11, the committee advised that a judge is not automatically disqualified in all cases involving the sheriff's department when that department employs a family member of the judge. Opinion 12-02.

In Opinion 16-04, the committee advised that a judge need not recuse from all *Engle* Progeny cases assigned to the judge's trial division merely because a family member brought an *Engle* Progeny suit against a tobacco company defendant in the same judicial circuit before another trial judge. However, disclosure would be required in all *Engle* Progeny cases assigned to the inquiring judge's division "[u]ntil no reasonable person would consider the information relevant to a determination of the judge's impartiality."

In Opinion 17-20, the committee advised a judge who had inquired about several issues involving relatives: The judge must be disqualified if an attorney from a law firm in which the judge's brother-in-law is a partner appears as counsel in a case before the judge (subject to remittitur); the judge may enter an agreed-upon order submitted by the parties appointing the judge's cousin as a mediator, if the selection of the cousin was initiated by the parties; and the judge need not necessarily be disqualified if the wife or daughter of the judge's cousin appears before the judge, but disqualification may be required depending on the relationship between them, and the judge must disclose the relationship.

A general magistrate does not need to recuse from presiding over Marchman Act proceedings in which the appearing attorney represented the magistrate's brother-in-law in a Marchman Act case before another general magistrate in the same circuit, unless a personal bias or prejudice exists. But disclosure is required "until no reasonable person would consider the information relevant." Opinion 17-21.

16. What Is Judge's Responsibility When Spouse or Child Is Employed by or Works with Firm or Governmental Entity That Appears Before Court in Capacity of Party's Legal Representative?

In Opinion 81-01, the inquiring judge wanted to know if, as the only circuit judge in a relatively small county, he would need to disqualify himself each time a local attorney employing the judge's spouse appeared in a case before the judge. The committee advised the judge to recuse under these circumstances. More recently, in Opinion 97-08, the committee said that a judge should disqualify himself from cases in which his non-lawyer spouse, as a temporary worker, was employed to help a firm on a case scheduled to be heard before that judge.

In Opinion 87-11, the committee advised a judge to take steps to ensure that the assistant public defender did not appear before him because the assistant public defender was engaged in the practice of law with the judge's spouse. Similarly, a judge must disqualify himself from a case in which the judge's spouse is a lawyer or supervises lawyers who will appear before the judge. *See* Opinion 01-05 (advising that judge should disqualify himself or herself from hearing cases involving public defender when judge's spouse is elected public defender of circuit); Opinion 99-28 (calling for judge's recusal when his spouse, practicing in another county, represents insurance companies that, in unrelated matters, appear before judge).

In Opinion 91-17, the inquiring judge was married to an assistant public defender working in the judge's circuit. The judge asked whether she could preside over

criminal cases in which the defendant was represented by an assistant public defender other than her husband. The committee determined that the disqualification was not automatic simply because the judge's spouse worked with a lawyer who represented the defendant in a proceeding before the judge. The committee issued a caveat, however, stating as follows: "If, though, the circumstances of the case somehow place your impartiality in question, e.g., your spouse assisted the trial attorney in the preparation of the case, you should disqualify yourself. Otherwise, you should advise the parties your spouse is an assistant public defender in that office, and offer to step down."

In Opinion 12-33, the committee advised that a judge in the circuit criminal division must disclose that the judge's spouse is employed as sworn legal counsel to the local sheriff's office, but only when that office is the investigating or arresting agency, or the judge is aware of other involvement by that office in the case and the judge believes the parties or their lawyers might consider the situation relevant to disqualification.

Sometimes a judge's spouse is not an attorney but is employed by a governmental agency that frequently appears before the court. The committee addressed this issue in Opinion 90-23. The inquiring judge in that opinion stated that his spouse was the district program administrator for the Department of Health and Rehabilitative Services and, as such, was responsible for all aspects of child support enforcement throughout the district that encompassed the judge's court. The committee unanimously agreed that the judge should not preside in any case over which the judge's spouse had supervisory authority. The committee found relevant the fact that the spouse had direct control regarding compensation of attorneys who appeared in court, including the amount they were paid, especially because the compensation of attorneys was directly related to the amount of support collected by the family division judge.

In Opinion 85-02, the committee recommended that a judge disqualify himself in cases involving his son's law firm unless both parties were notified of the relationship and entered into an agreement that the judge could preside. *See also* Opinion 18-26 (judge may preside over circuit court criminal division if judge's child is assistant public defender assigned to separate circuit court criminal division before another judge in same county, and judge need not automatically disclose that judge's child's employment); Opinion 12-02 (county judge whose child works in state attorney's office in same county is not automatically disqualified from all criminal cases; however, parties should be informed); Opinion 89-21 (judge's father was certified mediator, and committee unanimously agreed it

would be improper for judge to refer cases to his father); Opinion 77-04 (brother's position as chief assistant public defender did not by itself disqualify judge from sitting on cases handled by assistant public defender administratively assigned by brother; *but see* Opinion 11-21); Opinion 77-12 (brother's service as assistant state attorney not necessarily disqualifying, and use of "waiver form" found advisable as long as judge immediately recuses if defendant or attorney in criminal case fails or refuses to file waiver; *but see* Opinion 11-21).

The following are summaries of other relevant committee advisory opinions;

In Opinion 18-13, the committee recommended that a judge not preside over cases which the spouse supervises or in which the judge's spouse is the attorney of record.

In Opinion 17-03, the committee advised that a judge must disclose that a lawyer appearing before the judge has referred a case to the judge's spouse who is a lawyer and who may have shared, or will share, a fee with the referring lawyer. However, if the judge discloses that business relationship, recusal is not automatically required.

In Opinion 12-32, the committee advised that where the judge's stepniece was an attorney with the public defender's office, the judge's disqualification was not required in all criminal cases in which a public defender is involved. And when the stepniece appears before the judge, the judge is not per se disqualified (disqualification would depend on the closeness of their relationship), but the relationship should be disclosed to the parties and their lawyers.

In Opinion 11-21, the committee advised that a judge should be disqualified from presiding over felony arraignments in a county where the judge's spouse is the supervisor of the state attorney's office.

In Opinion 10-09, the committee advised that a judge married to the elected public defender may not preside over cases to which the public defender is assigned, even if the private attorneys handle the cases without public defender supervision.

In Opinion 10-08, the committee advised that an ethical violation would occur if a judge served as chief judge in a judicial circuit while in a longstanding relationship with one of the general magistrates serving in that circuit.

In Opinion 08-18, the committee advised that a judge who is the spouse of a retired public defender may preside over cases involving the public defender's office, including cases in which the retired spouse may be called to testify in post-

conviction hearings (unless spouse actually is called to testify). However, the judge may not preside over public defender cases in which the retired spouse may have been privy to privileged communications.

In Opinion 07-14, the committee advised that a judge is obligated to disqualify himself or herself when a lawyer from a firm employing the judge's spouse as a paralegal appears before the judge.

In Opinion 05-17, the committee recommended that a judge direct a central staff attorney not to work on cases in which the attorney's spouse is involved, but stated that the attorney is not required to disqualify himself or herself from working on all cases involving the legal department of a governmental agency employing the attorney's spouse as an attorney.

17. Must Judge Disqualify Self If Former Law Partner Is Appearing Before Judge?

In Opinion 77-11, the committee unanimously advised that there is no per se impropriety in a former law partner of the judge practicing before the court. The committee also unanimously agreed that it would be improper for the judge to sit on any case in which the judge had a monetary interest. In Opinion 01-06, the committee elaborated, "assuming that no financial arrangement exists between the inquiring judge and the lawyer in question and, further, that a sufficient time has passed so that no objective person would question the judge's impartiality, the judge need not observe a per se rule of disclosure or disqualification." In Opinion 01-06, the question was whether a judge could preside over a case in which the judge was previously employed as a law clerk by a non-suspended attorney appearing pro se.

In Opinion 15-01, the committee stated that a judge need not disclose or disqualify when a former law partner of the judge's former spouse, who rents space from and shares a receptionist with the judge's former spouse, appears before the judge. The inquiring judge did not receive alimony or support from the former spouse.

18. Must Judge Recuse Self When Attorney Appearing in Case Before Judge Is Spouse of Attorney Representing Judge in Unrelated Civil Matter?

In Opinion 11-17, the inquiring judge asked whether recusal is required when an attorney appearing in a case before the judge is the spouse of an attorney representing the judge in an unrelated civil matter. The spouses were and had

always been in different law firms. The committee advised that recusal was not required because the judge's impartiality could not reasonably be questioned in a situation where

> an attorney representing a party appearing before the judge is married to an attorney who is representing the judge in an unrelated civil matter, so long as the attorney spouses are not in the same law firm, the attorney representing the judge has never been affiliated with the attorney's spouse's law firm, and the attorney spouse in the case before the judge has no financial stake in the outcome of the judge's case with the attorney's spouse.

19. Must Judge Recuse Self When Law Firm Appearing in Case Before Judge Represented Judge and/or Family in Prior Case?

For a reasonable period of time after the conclusion of the representation, a judge must recuse in all cases involving the attorney and the law firm that represented the judge and the judge's family in a previous personal injury case. And for a reasonable period of time (several months to one year), the judge must at least disclose the prior attorney-client relationship. Opinion 12-37.

If the judge consulted with, but did not hire, an attorney to represent the judge a year ago, the judge need not recuse from cases in which the attorney or law firm appears as counsel. Whether disclosure is required must be determined on a case-by-case basis. Factors that should be considered on the issue of disclosure "include, but are not limited to, the nature of the claim, the monetary value of the claim, whether or not the judge paid for the consultation, whether or not the consultation had any effect upon the disposition of the claim, and the current relationship between the judge and the attorney/law firm." Opinion 13-02.

A judge does not have to automatically recuse without request when a close relative and that relative's company are represented by a law firm whose lawyers have unrelated cases pending before the judge, but disclosure of the firm's relationship with the judge's spouse is required. Opinion 18-22.

20. Must Judge Recuse Self in Cases Involving Entity Whose Employee Is Close Friend?

A judge need not recuse from all cases involving a bank whose loan collection official is the judge's close personal friend, but must recuse when the friend appears as a party, witness, or representative of the bank "or any case in which the

judge's impartiality might reasonably be questioned." In cases involving the bank where the judge is not required to recuse, the judge must nevertheless disclose the relationship to the parties. Opinion 12-37.

21. What Is Responsibility of Judge Facing Re-election Campaign When Member of Judge's Campaign Committee Is Opposing Counsel?

A judge facing a re-election campaign must provide notice to parties when a member of the judge's campaign committee is opposing counsel, even in cases that are likely to be handled or disposed of without formal court appearances. The judge may not use campaign literature or campaign funds in providing the necessary notice. Opinion 13-19. A judge facing a re-election campaign who has appointed a campaign committee that includes attorneys must always disclose those attorneys' status to counsel or parties opposing them in proceedings before the judge, but the mere fact that an attorney contributed to the judge's campaign or helped with the committee does not automatically require recusal. Opinion 14-09.

Chapter Six

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Chapter Six

Civic, Charitable, Quasi-Judicial, and Extrajudicial Governmental Activities

1. What Are General Rules Governing Such Activities?

The judicial conduct discussed in this chapter is regulated primarily by Canon 4, quasi-judicial activities, and Canon 5, extrajudicial activities.

2. May Judge Serve on Board of Directors of Charitable Organization?

Yes, but subject to strict limitations. Providing service to a charitable organization is considered extrajudicial activity regulated by Canon 5. Specifically, Canon 5C(3) provides that "[a] judge may serve as an officer, director, trustee or non-legal advisor of an educational, religious, charitable, fraternal, sororal or civic organization not conducted for profit," subject to certain limitations. The judge is not permitted to serve in that capacity if the organization is likely to be engaged in proceedings that ordinarily would come before the judge or if it will be involved frequently in adversary proceedings in the judge's court or in any court subject to the appellate jurisdiction of the judge's court. In addition, a judge could not serve on the board of directors if doing so would violate any of the general provisions of Canon 5A, which state that the service must not cast reasonable doubt on the judge's capacity to act impartially, undermine the judge's independence, integrity, or impartiality, demean the judicial office, interfere with judicial duties, lead to frequent disqualification, or appear to a reasonable person to be coercive. Canon 5C(3)(b)(i) states that a judge "shall not personally or directly participate in the solicitation of funds, except that a judge may solicit funds from other judges over whom the judge does not exercise supervisory or appellate authority." Canon 5C(3)(b)(ii) provides that a judge "shall not personally or directly participate in membership solicitation if the solicitation might reasonably be perceived as coercive," and Canon 5C(3)(b)(iii) provides that a judge "shall not use or permit the use of the prestige of judicial office for fund-raising or membership solicitation."

The commentary to Canon 5C(3)(a) states that judges must regularly examine the activities of each organization with which they are affiliated to determine whether the affiliation is proper. For example, the commentary mentions that in many

jurisdictions, charitable hospitals frequently are involved in litigation. The committee has advised judges to decline appointment to the boards of directors of charitable hospitals. In Opinion 94-02, the committee noted that "hospitals are frequent litigants in courts involving hundreds of small claims actions as well as major malpractice cases." *See also* Opinions 03-07, 91-32, 91-25, and 83-09.

Judges who serve on the boards of directors of charitable organizations also must be aware of Canon 5G, which prohibits judges from practicing law except under limited circumstances. A judge is prohibited from providing legal advice to the charitable organization. A civil traffic infraction hearing officer may serve as president of a legal aid organization, as long as the organization does not engage in litigation in traffic court, because, unlike judges, civil traffic hearing officers are exempt from Canons 4 and 5. Opinion 14-13.

In Opinion 14-25, the committee advised that a circuit judge assigned to the juvenile division may not serve as chair of an organization that "seeks to eradicate human trafficking through education, outreach, training, advocacy and awareness of human trafficking issues for juveniles and adults." It would cast doubt on the judge's ability to be impartial, as the organization is dedicated to an issue that is routinely before the judge.

In Opinion 14-15, the committee advised that a judge may serve on the board of directors of a nonpartisan women's non-profit foundation or the Leukemia and Lymphoma Society, which engage in fund-raising activities, as long as the judge does not personally participate in the solicitation of funds or other fund-raising activities.

In Opinion 13-06, the committee advised that a judge who serves in the juvenile division may serve on the board of directors of a not-for-profit organization to be formed to provide financial assistance to needy children and families. While the children and families will be referred to the organization by a local law enforcement agency, and an officer from that agency will serve on the board, the board will not know the identities of the children and families, and the judge will not be involved in fund-raising activities.

In Opinion 11-18, the committee advised that a judge may not be paid pursuant to a contract with a television network for a teaching segment which would involve explaining the law and sentencing choices and interviewing different players in the court system. The activity in question could cast reasonable doubt on the judge's

capacity to act impartially as a judge and could lead to the judge's frequent disqualification.

In Opinion 10-38, the committee advised that a judge may not serve on the board of a charitable foundation whose principal funding source is the owner of a for-profit program to which the judge refers misdemeanants.

In Opinion 10-07, the committee advised that a judge, who presides in a criminal division may serve on board of directors for a non-profit organization that provides a pre-trial diversion program and social services for juveniles.

In Opinion 06-05, the committee advised that a judge who sits on a charitable organization's "advisory board of directors" may allow his name and position to be listed on the organization's letterhead along with names and positions of all the other board members.

3. May Judge Be Member or Serve on Board of Directors of Civic Organization?

Yes, a judge may be a member or director of a civic organization, but the same requirements under Canon 5 that pertain to charitable organizations govern a judge's involvement in civic organizations. In addition, Canon 2C, which states that judges "should not hold membership in an organization that practices invidious discrimination," is especially important with respect to such memberships. While some charitable organizations may practice invidious discrimination, it is far more likely that a judge would encounter this kind of discrimination in civic organizations.

Judges have been advised to decline an invitation to serve on the boards of directors of Mothers Against Drunk Drivers (MADD) and Students Against Drunk Drivers (SADD). Opinions 86-06, 82-18. Such involvement could cast doubt on a judge's impartiality. *See* Fla. Code Jud. Conduct, Canons 3 and 5A(1). It also could be seen to be advancing the private interests of others. Fla. Code Jud. Conduct, Canon 2B.

With regard to a judge's involvement in civic organizations, the commentary to Canon 2C specifically provides that:

> This canon is not intended to prohibit membership in religious and ethnic clubs, such as Knights of Columbus, Masons, B'nai B'rith, and

Sons of Italy; civic organizations, such as Rotary, Kiwanis, and The Junior League; young people's organizations, such as Boy Scouts, Girl Scouts, Boy's Clubs, and Girl's Clubs; and charitable organizations, such as United Way and Red Cross.

The following opinions are also of interest regarding a judge's involvement in civic organizations:

- **Opinion 18-23** (judge may research, write, and appear in televised public service announcements that discuss issues surrounding family violence, and may be compensated for appearance).

- **Opinion 18-15** (senior judge may not serve on judicial council of church because judge would appear to be acting as legal advisor);

- **Opinion 17-19** (judge may not serve on board of directors of neighborhood family community center funded almost exclusively by government grant);

- **Opinion 17-18** (judge may not continue to serve in advisory role for nonprofit cultural organization that takes public positions on pending legislation, nor may judge sign confidentiality agreement with that organization as to matters learned while serving in that role);

- **Opinion 17-08** (judge may serve as "judge" for preliminary Miss America pageant competitions, and may participate at pageant competition by showcasing talent, such as singing, as long as judge acts "at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary");

- **Opinion 16-20** (judge may not serve on local bar association committee formed to host golf tournament to raise funds for Guardian Ad Litem Foundation, which appears in every dependency case before judge, but judge may attend tournament and assist with organizational non-fundraising tasks);

- **Opinion 15-12** (judge may not serve as officer, with view toward becoming president, of organization that benefits families of law enforcement officers and firefighters, who lost their lives in line of duty; such service could create reasonable doubt as to judge's impartiality);

- **Opinion 15-11** (judge may serve on board of church-sponsored non-profit

organization that plans to establish and manage program to assist ex-offenders in finding job, and otherwise integrating into society, if judge does not assist in fund-raising, participate in administration of public funds, or contact potential employers);

- **Opinion 13-23** (judge may attend and make religious comments from pulpit at church's "God and Country Day," but should not be in group photograph if judge knows or has reason to believe it will be used to advance church's private interests through solicitation of members or donations);

- **Opinion 13-17** (judge may participate in cultural festival cook-off, as long as event is not fund-raiser and judge's participation will not be advertised or used in manner that would lend prestige of office for advancement of private interests of others);

- **Opinion 13-16** (judge may serve on board development committee and board of directors of scouting organization as long as judge does not personally and directly participate in fund-raising or otherwise engage in conduct that could reasonably be deemed to be coercive);

- **Opinion 13-07** (judge may serve as college football referee as long as it does not conflict with judicial duties);

- **Opinion 12-36** (judge may not attend religious organization's fund-raising dinner when invitations mistakenly listed judge as one of the hosts; judge's attendance would lend prestige of judicial office to further private interests of organization);

- **Opinion 12-31** (chief judge may permit general magistrate or court staff to attend training session sponsored by Salvation Army and FCADV as it concerns law, legal system, and administration of justice and does not involve membership in sponsoring organizations);

- **Opinion 12-30** (judge may not accept award at non-law-related charity luncheon where silent auction will be taking place as event is fund-raiser);

- **Opinion 12-29** (judge participating in charity walk-a-thon may not wear shirt with name of team named for local attorney; judge's spouse may solicit and donate funds on behalf of self and team but not on behalf of judge);

- **Opinion 11-19** (retired judge who wishes to preside as senior judge in future may not serve on board of Innocence Project of Florida unless judge chooses to enter practice of law);

- **Opinion 11-12** (judge may not receive award at fund-raising event for veterans' organization because event is not law-related and veterans' organization is not devoted to law, legal system, or administration of justice);

- **Opinion 11-04** (judge may appear in television public service announcement on juvenile needs and issues and encourage parents to call parenting help line sponsored by private nonprofit organization);

- **Opinion 10-24** (judge may serve as honorary chairman of bar association tennis tournament that is not fund-raising event and is intended to promote bench-bar collegiality);

- **Opinion 10-15** (judge may participate as walker in walk-a-thon fundraiser to benefit charitable organization and make personal contribution to support cause, as long as judge does not solicit sponsorships);

- **Opinion 10-13** (judge may speak about judiciary's role in foreclosures at student rally that also includes President of United States as speaker);

- **Opinion 09-13** (judge may join local gun club to use shooting range where club requires proof of National Rifle Association (NRA) membership provided judge does not participate in NRA lobbying or fund-raising);

- **Opinion 09-12** (judge may serve on religious organization's committee that determines whether members qualify for reduced membership dues);

- **Opinion 09-11** (judge may not be member of committee of non-profit organization that educates lawyers and judges about domestic violence and encourages lawyers to provide pro bono services to battered women and children);

- **Opinion 09-04** (judge may serve as officer of alumni association of public university in Florida);

- **Opinion 07-20** (judge may not address partisan group regarding

improvements in law, legal system, and administration of and justice for children from foster care through adoption);

- **Opinion 03-01** (judge may serve in organization dedicated to improving community quality of life through improved race relations);
- **Opinion 02-17** (judge permitted to serve as president of non-profit civic organization that provides cultural events and outreach programs);
- **Opinion 01-13** (committee approved of judge's membership in American Israel Public Affairs Committee);
- **Opinion 00-25** (judge advised that it was appropriate to serve as officer/director of Kiwanis Club Foundation but that nature of legal aid society would determine whether judge could serve as officer or director);
- **Opinion 97-19** (judge allowed to serve on board of lobbying organization);
- **Opinion 96-04** (judge permitted to serve on board of "Character Counts" organization regarding the manufacture, sale, consumption, or use of cutlery items);
- **Opinion 95-34** (judge permitted to serve as uncompensated member of board or advisory committee of non-profit corporation of which main function is researching, locating, recovering, restoring, and displaying of artifacts of historical interest);
- **Opinions 94-47** and **87-10** (membership in Benevolent and Protective Order of Elks and Rotary not proscribed by code);
- **Opinion 94-15** (serving on law school governing board is permitted);
- **Opinion 94-11** (serving as president of private non-profit organization providing grants and scholarships not prohibited as long as judge avoids personally soliciting funds or allowing prestige of office to be used for that purpose).

4. What Does Invidious Discrimination Mean?

"[A]n organization is generally said to discriminate invidiously if it arbitrarily excludes from membership on the basis of race, religion, sex, or national origin

persons who would otherwise be admitted to membership." Fla. Code Jud. Conduct, Commentary to Canon 2C. The Commentary to Canon 2C also states that the question of whether an organization practices invidious discrimination cannot be answered merely by looking at that organization's membership rolls. There are some legitimate reasons that organizations restrict their membership. For example, some organizations are dedicated to the preservation of religious, ethnic, or cultural values of legitimate common interests to their members. Also, intimate, purely private organizations whose membership limitations could not be constitutionally prohibited may limit membership without being invidiously discriminatory. *See* Fla. Code Jud. Conduct, Commentary to Canon 2B (listing citations).

Judges who belong to an organization that engaged in invidious discrimination as of January 1, 1995, the date the Code of Judicial Conduct became effective, may either resign from the organization or attempt to have the organization discontinue its invidiously discriminatory practices. A judge who attempts to convince the organization to change its discriminatory practices, however, is prohibited from participating in the organization's activities until the discrimination ceases, and the judge has only one year from the time the judge learns of the discriminatory practice in which either to persuade the organization to change its practices or to resign.

5. May Judge Be Member of Governmental Committee, Commission, or Task Force?

Canons 4 and 5 provide that a judge may be a member of a governmental committee, commission, or task force, but there are numerous restrictions on such membership. In addition to the restrictions that apply to service on the boards of directors of charitable and civic organizations, the governmental committee must be involved in the improvement of the law, the legal system, or the administration of justice. Florida Code Jud. Conduct, Canons 4C, 5C(1), and (2).

The following opinions are of interest with regard to a judge's involvement in governmental committees, commissions, and task forces:

- **Opinion 18-19** (judge may accept appointment as non-voting chair of committee created by county commission to consider establishment of Children's Services Council, but judge should be mindful of significant restrictions that might hinder ability to chair committee).

- **Opinion 18-17** (judge may not serve on statutorily created council that

nominates veterans to receive awards for service).

- **Opinion 18-09** (judge may serve as commissioner with National Conference of Commissioners on Uniform State Laws).

- **Opinion 17-15** (judge may speak to civic and community groups about Constitutional Revision Commission (CRC) as part of Florida Bar-sponsored "Protect Florida Democracy" program).

- **Opinion 17-02** (judge may accept appointment to Florida Impaired Driving Coalition, advisory body to Florida DOT, if it "does not engage in matters that could reasonably be perceived as favoring the State in DUI prosecutions").

- **Opinion 16-19** (judge may seek and accept appointment to Florida Constitutional Revision Commission if it does not interfere with performance of judicial duties; CRC is not part of executive or legislative branch, and its work involves improvement of law, legal system, and administration of justice);

- **Opinion 16-11** (judge may not serve on School Advisory Council assisting with preparation and evaluation of School Improvement Plan because it operates for non-law related public school; but judge may serve on board of nonpartisan or bipartisan public awareness organization);

- **Opinion 14-20** (judge may not serve on statutorily created county development authority that decides grant requests "from industry seeking to start or relocate in the county and from local governments seeking to upgrade their infrastructure" because it would involve funding issues that are not related to the improvement of the law, legal system, judicial branch, or administration of justice);

- **Opinion 13-03** (judge may not participate in county elections task force to address issues encountered in judge's county and throughout state during general election; issues would likely involve activities that could call into question judge's ability to be fair and impartial, constitute comment on pending litigation, and be controversial);

- **Opinion 11-05** (judge may not chair nonprofit organization designed to assist, promote, and support public school board and superintendent in

activities that improve quality of instruction in public school system within judge's circuit);

- **Opinion 09-14** (judge may not appoint members to board of ethics created by ordinance for benefit of municipal government);
- **Opinion 09-06** (judge may not serve on local county ethics commission for purpose of establishing code of ethics for county commission);
- **Opinion 07-03** (judge may serve on government reform commission);
- **Opinion 06-29** (judge may not join law enforcement auxiliary);
- **Opinion 06-23** (judge may serve on county's affordable housing advisory board and as board member of county's public policy institute);
- **Opinion 06-09** (judge who was formerly staff attorney with legal services organization may submit congratulatory message for advertisements for event for that organization);
- **Opinion 06-04** (judge may not serve on congressional district selection committee to help select nominees for military academies);
- **Opinion 05-13** (judge may attend legal seminar sponsored by criminal defense lawyers association or equivalent prosecutors group);
- **Opinion 01-16** (judge advised not to serve as appointed member of commission of municipal government charged with fiscal oversight of government funds);
- **Opinion 99-20** (judge may serve on Florida Bar Civil Procedure Rules Committee);
- **Opinion 99-07** (judge may serve on board of directors of county's commission on substance abuse);
- **Opinion 98-26** (judge may serve on mayor's victim assistance advisory council);
- **Opinion 97-20** (judge may serve on county criminal justice commission);

- **Opinion 96-22** (attending education assembly for revision of educational system is permitted);

- **Opinion 95-36** (judge may serve on alcoholism committee);

- **Opinions 95-14**, **94-38**, and **94-33** (serving on governor's task force on domestic violence is not prohibited if activities are law-related and gender neutral and judge has evaluated reputation of task force to determine whether judge would be perceived as impartial and whether such service would result in frequent motions for disqualification); *but see* Opinion 01-14 (judge cannot serve on domestic violence task force if it appears to have become advocacy group);

- **Opinions 93-46** and **93-39** (judge may serve on local children's advisory board that recommends how funds will be spent locally because such service is related to improvement of administration of justice; however, judge should not serve or should limit participation if board is likely to be engaged in proceedings that come before judge or if participation would reflect adversely on judge's impartiality or interfere with judicial duties);

- **Opinions 88-30** and **88-24** (judge may serve on alcohol, drug abuse, and mental health district planning council);

- **Opinion 87-20** (serving on governmental criminal justice advisory board to help qualify county for assistance from federal government for planning new jail facility is permitted because committee's work is law-related);

- **Opinion 87-05** (judge should not serve on governmental fine arts council because function of council is not law-related).

6. May Judge Participate in Raising Funds for Civic, Charitable, and Governmental Organizations?

Canons 4 and 5 permit a judge to assist civic, charitable, and governmental organizations in planning fund-raising and in managing and investing funds, but both canons prohibit judges from participating in the solicitation of funds or other fund-raising activities, except that a judge may solicit funds from other judges over whom the judge does not exercise supervisory or appellate authority. A judge may appear or speak at a fund-raising event only if the event concerns the law, the legal system, or the administration of justice, and the funds raised will be used for a law-

related purpose. In addition, a judge may not participate personally in membership solicitation if the solicitation might reasonably be perceived as coercive, and the judge may use court premises, staff, stationery, equipment, or other resources only for activities that concern the law, the legal system, or the administration of justice. Fla. Code Jud. Conduct, Canons 4D(2) and 5C(3).

The following are summaries of committee opinions related to judicial participation in fund-raising:

- **Opinion 18-28** (judge may accept distinguished alumni award from law school judge graduated from when ceremony is fundraiser for scholarships for law students, as long as judge makes reasonable and continuous efforts to ensure that judge's participation falls within parameters of relevant canons);

- **Opinion 18-27** (JEAC members evenly divided on whether judges may solicit donations from fellow judges to provide hurricane relief directly to court employees affected by hurricane);

- **Opinion 18-25** (judge members of Florida Supreme Court committee may not solicit funds from The Florida Bar, voluntary bar associations, private for-profit and not-for-profit corporations, law firms, lawyers, and other groups for defraying cost of hosting annual conference of National Consortium on Racial and Ethnic Fairness in the Courts);

- **Opinion 18-05** (judge may permit legal aid organization to list judge as member of host committee on invitation to fundraising event, as long as judge complies with Canon 4, including ban on direct solicitation of funds);

- **Opinion 17-22** (judge may accept award from local voluntary bar association at gala that is fundraiser for law students, if judge makes "reasonable and continuous efforts to ensure that the judge's participation falls within the parameters of the relevant Canons");

- **Opinion 15-13** (judge facing re-election may attend nonpartisan political rally fund-raiser for Chamber of Commerce; there was no indication that Chamber planned to use funds to make contributions to selected political candidates);

- **Opinion 15-05** (judge may not, as member of board of directors of District Court of Appeal Historical Society, encourage others to participate in

walk/run fundraiser sponsored by bar association to support pro bono project unless solicitation is limited to judges over whom judge does not exercise supervisory or appellate authority; however, judge may participate as team captain and coordinate logistics such as snacks and T-shirts);

- **Opinion 14-24** (judge may donate funds remaining in campaign account to 501(c)(3) organization on whose board judge serves where there has been no "personal, active, direct or individual solicitation of anyone by the judge");

- **Opinion 14-26** (judge may donate money to legal aid organization whose attorneys appear before judge if circumstances would not cause reasonable perception that judge's ability to carry out judicial responsibilities with integrity, impartiality, and competence is impaired);

- **Opinion 14-15** (judge may contribute to, but may not personally participate in fund-raising for, a women's non-profit foundation of which that judge is member);

- **Opinion 14-07** (judge who is member of regional Association for Women Lawyers may model for cocktail party and fashion show where proceeds "primarily benefit . . . a free childcare facility located inside the . . . courthouse" but also help fund association's "assistance to deserving law students in need of financial support"; committee found activities to be related to improvement of law, legal system, and administration of justice);

- **Opinion 13-18** (judges assigned to specialized domestic violence division may not participate in or attend fund-raising walk-a-thon sponsored by nonprofit organization whose mission is to raise awareness for domestic violence victims and provide them with support);

- **Opinion 13-05** (judge assigned to dependency division may allow individuals or groups to donate items for children to play with while children are in court, as long as neither judge nor judge's court personnel solicits donations);

- **Opinion 12-26** (judge may ask local bar association to hold lunch meeting so judge may solicit attorneys to volunteer as pro bono attorneys ad litem for children in dependency cases, if request would not appear to reasonable person to be coercive or cast doubt on judge's ability to be impartial; but judge may not accept association's offer to raise funds to pay for meeting,

because it supports guardian ad litem volunteers and children they represent and would thus raise doubt about judge's ability to be impartial);

- **Opinion 12-24** (judge may give keynote speech at Girl Scouts council's annual business meeting and award ceremony, which are not fund-raisers, but "judge is cautioned that her name or likeness may not be used by the Girl Scouts to solicit funds or membership");

- **Opinion 12-04** (judge who is member of supreme court standing committee may not directly solicit donations from voluntary bar associations for printing and distributing brochure committee drafted regarding perception of fairness in Florida courts; judge's committee activities were consistent with Canon 4D(2) but solicitation of funds was not);

- **Opinion 11-15** (Canon 5 permits judge seeking re-election to be hole sponsor at charity golf tournament hosted by Young Lawyers Section of local bar association although proceeds at event will benefit various non-law related projects);

- **Opinion 11-13** (judge may not directly solicit local banks and businesses to assist in providing goods and/or services to "financial literacy" program that educates families on money management issues);

- **Opinion 11-06** (judge may assist in planning fund-raising and may make recommendations for YWCA program that provides supervised childcare to parents and guardians attending court-related matters, but may not be speaker, guest of honor, or otherwise be featured at fund-raising event for YWCA, an organization that is not solely devoted to law, legal system, or administration of justice);

- **Opinion 09-15** (judge may not permit local non-profit legal services corporation, as part of fund-raising, to use video interview of judge filmed while judge was lawyer in private practice);

- **Opinion 09-07** (judge may not attend and receive award at fund-raising event for organization involved in domestic and international education projects);

- **Opinion 08-23** (judge may purchase congratulatory advertisement for program materials for Anti-Defamation League where ad would include

judge's name);

- **Opinion 08-17** (judge may be speaker at fund-raiser dinner for drug court but must ensure both event and sponsoring entity are devoted to improvement of law, legal system, judicial branch, or administration of justice).

An organization in which a judge is an officer or director may use its letterhead for fund-raising or membership solicitation "provided the letterhead lists only the judge's name and office or other position in the organization, and, if comparable designations are listed for other persons, the judge's judicial designation." In addition, a judge may attend an organization's fund-raising event if such attendance is otherwise consistent with the code, but the judge may be a speaker or guest of honor at such an event only if the event concerns the law, the legal system, or the administration of justice and the funds raised will be used for law-related purpose(s). Fla. Code Jud Conduct, Commentary to Canons 4D(2)(b) and 5C(3)(b).

The Florida Supreme Court publicly reprimanded a judge for promoting, advertising, and conducting gambling with respect to a golf tournament. *In re Byrd*, 460 So. 2d 377 (Fla. 1984).

The following committee opinions are of interest with regard to a judge's involvement with the financial activities of civic, charitable, and governmental organizations:

- **Opinion 16-01** (judge could not sit on board of charter school even if service is limited to "as it pertains to the functions that are solely related to combating illiteracy in the community" and not related to operation of school: "service on a board of directors cannot be divided in the way the inquiring judge describes");

- **Opinion 15-02** (judge may not attend award luncheon to accept award and be inducted into County Hall of Fame sponsored by county's Women's History Coalition, where program advertisements are sold to raise funds for sponsoring organization (citing Opinion 99-09), even if judge takes steps to avoid judge's name being used for fundraising in any way).

- **Opinion 12-16** (judge may not serve on board of non-profit organized to bid for state contracts as entity as entity "would be in essence a governing entity" not devoted to improvement of law, legal system, judicial branch, or

administration of justice; rather, entity organizers sought to use prestige of judicial office to advance interest of entity and vendor);

- **Opinion 11-14** (judge may not serve as waiter at charitable organization's fund-raiser luncheon when wait staff will be composed of elected officials and contributions will be collected by nonjudicial elected officials);

- **Opinion 11-13** (judge may not directly solicit local banks and businesses to assist in providing goods and/or services to "financial literacy" program that educates families on money management issues);

- **Opinion 11-12** (judge may not participate by receiving award at fund-raiser for veterans' organization);

- **Opinion 11-03** (judge may not accept award civic organization advertised it will bestow on judge at fund-raising event);

- **Opinion 10-33** (judge may not accept award from organization that provides business training and networking for women);

- **Opinion 10-32** (judge may participate in skit for American Inn of Court in contest with award of charity contribution);

- **Opinion 10-31** (chief circuit judge may send letter to "Members of the Bar" soliciting lawyers' participation in pro bono campaign of The Florida Bar);

- **Opinion 10-23** (non-judge judicial candidate may wear campaign badge or button and distribute campaign literature at fund-raising event for charity; *but see* Opinion 11-15);

- **Opinion 10-17** (judge may contribute money to local legal aid society in lieu of performing pro bono legal service hours);

- **Opinion 09-15** (judge may not permit local non-profit legal services corporation, as part of fund-raising, to use video interview of judge filmed while judge was lawyer in private practice);

- **Opinion 09-07** (judge may not attend and receive award at fund-raising event for organization involved in domestic and international education projects);

- **Opinion 08-23** (judge may purchase congratulatory advertisement for program materials for Anti-Defamation League where ad would include judge's name);
- **Opinion 08-22** (judge may not appear as guest actor in fund-raising dance production sponsored by ballet company organized as charitable organization; judge may not allow judge's name to be used to advertise event);
- **Opinion 08-20** (judge may serve on executive committee for non-profit charitable organization if judge not directly involved in fund-raising);
- **Opinion 08-17** (judge may be speaker at fund-raiser dinner for drug court but must ensure both event and sponsoring entity are devoted to improvement of law, legal system, judicial branch, or administration of justice);
- **Opinion 07-18** (judge should not solicit business donations but may solicit volunteers to volunteer time to non-profit corporation);
- **Opinion 07-08** (judge may not serve on board of trustees for branch campus of state university);
- **Opinion 07-07** (judge should not allow use of his or her photograph on billboards promoting county library system);
- **Opinion 07-05** (judge should not solicit or receive gifts from lawyers for use as rewards to drug court participants);
- **Opinion 07-04** (judge should not provide fund-raising auction items identifiable as items made by judge);
- **Opinion 06-28** (opinion lists answers to multiple questions regarding proposed fund-raising and charitable organization activities);
- **Opinion 06-17** (judge may participate in Mothers Against Drunk Driving panel discussion regarding underage drinking);
- **Opinion 06-06** (judge may attend holiday party hosted by guardian ad litem program but may not accept gifts);

- **Opinion 05-14** (judge may forward to charity donations sent in response to solicitation letter written by judge prior to seeking appointment to bench but may not run race sponsored by this same charity and intended to raise money for charity);

- **Opinion 05-12** (judge may not produce and narrate video in which judge asks support for court restoration when video is to be used for fund-raising);

- **Opinion 03-21** (receding from Opinion 80-1, committee advised inquiring judge not to serve on board of trustees of community college);

- **Opinion 01-09** (opinion lists breakdown of answers to multiple questions regarding proposed fund-raising and charitable organization activities; judge may decorate hall, set prices for sale items, and donate items for charitable sale as long as judge is not identified as donor; judge may not be featured speaker, host social gathering, or be present if judge's spouse hosts charitable fund-raising event in family home);

- **Opinion 00-31** (judge advised not to serve as chairperson for kick-off event preceding fund-raising auction);

- **Opinion 00-15** (judge may not tape public service announcement advising community of non-profit organizations in area to which community can lend its support);

- **Opinion 99-15** (judge may not speak at alumni banquet fund-raiser);

- **Opinion 99-09** (judge advised against receiving award and being inducted into county women's hall of fame at annual luncheon for which program advertisements were sold to raise funds for organization; receiving award would lend prestige of judicial office for fund-raising);

- **Opinion 98-32** (judge advised not to participate in charity fashion show as emcee);

- **Opinion 96-27** (judge may participate in building Habitat for Humanity house; judge may not present or portray Habitat building project as project of judge of county and must not call attention to himself or herself as judge; judge may also "gently" solicit judicial colleagues over whom judge has no supervisory or appellate authority);

- **Opinion 95-22** (judge should not personally participate as team member in ongoing bingo games at local senior citizens center as fund-raising project for civic organization);

- **Opinion 94-33** (judge should not solicit in-kind donations as chair of domestic violence task force in judge's circuit);

- **Opinion 94-30** (judge should not solicit businesses to contribute to cost of creating videotapes for court system project to create juvenile justice education videotape to be used in public school instruction);

- **Opinion 93-61** (judge should not serve on honorary advisory board of directors of beach resort association because presence could lend prestige of judicial office to private interests of others);

- **Opinion 92-38** (judge should not personally collect coats and gloves to be distributed through religious charity to needy persons);

- **Opinion 89-19** (judge may participate in fund-raising sports event to extent that judge would hold sideline marker and would not be identified either before or during event as member of judiciary).

Although Canon 5C(3) permits a judge to serve as a trustee of an educational organization not conducted for profit, there are limiting exceptions found in Canon 5C(2). That section prohibits judges from accepting appointments to governmental positions that are concerned with issues other than improvement of the law, the legal system, or the administration of justice. The Canon 5C Commentary makes this distinction clear where it says, ". . . service on the board of a public educational institution, unless it were a law school, would be prohibited under Canon 5C(2), but service on the board of a public law school or any private educational institution would generally be permitted under Canon 5C(3)."

7. May Judge Create and Privately Maintain Website or Social Media Account?

Nothing in the code suggests that a judge's maintenance of a private website would give the appearance of impropriety, as long as the website complies with all provisions of the code. The committee addressed this issue in Opinion 11-01. A judge's website must not be of a commercial nature, and the judge establishing a site should avoid links to commercial sites. The judge should exercise caution in

linking to other websites because of the potential for perception of an endorsement of the contents and/or creator of such other website. A judge's website may not be used as a forum for the discussion of pending legal matters or otherwise be maintained so as to cast reasonable doubt on the judge's capacity to act impartially as a judge. Fla. Code Jud. Conduct, Canons 3B(9), 5A(1). A judge may publish a blog that reports and links to cases, "where the entries are intended to be neutral, nonjudgmental, brief summaries of the facts and holdings." Opinion 12-07.

A judge's website may be used for campaign purposes, subject to requirements and restrictions of Canon 7. A judge's personal website may not be used to solicit campaign support or contributions, but the judge's campaign committee may create a website for lawful purposes described in Canon 7C(1). Opinion 14-04. If the website seeks solicitation of funds or public support for the campaign, it should make clear that it is maintained by the committee and not the candidate personally. Opinion 12-15 (Election). The website can include a link to facilitate contributions, "[s]o long as the contributions are solicited by the committee, and the contributions are payable to the "Committee to Elect [candidate]." Opinion 14-04.

A judge running for re-election may create a Twitter account under certain circumstances. However, to avoid the possibility of ex parte communications, it would be more prudent for the judge's campaign manager to create and maintain the account. Opinion 13-14.

8. May Judge Speak to County Commission in Support of Funding Request?

In Opinion 12-22, a judge had inquired whether the judge was permitted, with the chief judge's approval, to appear before the county commission and speak in support of a specific software funding request. The committee concluded this was permissible and reiterated that a judge may lobby a governmental body as to "issues concerning the law, the legal system, and the administration of justice." It did caution the judge not to support a particular software provider or product, "to avoid violating Canon 2B's prohibition against lending the prestige of the judicial office to advance the private interests of another." It also noted that "[t]he Code does not prohibit the judge from speaking privately to individual commissioners about this funding request, so long as the conduct is not otherwise prohibited by law," such as Florida's Sunshine Law.

9. What Activities Are Permissible for Judge in Order to Secure

Volunteers for Judicial System-Related Programs?

In Opinion 13-10, a judge assigned to dependency court sought to address the significant lack of foster and adoptive parents for children in the dependency system. The judge's inquiry was whether the judge could create and allow to be broadcast public service announcements (PSAs) soliciting volunteers to serve as foster parents or adoptive families. The committee advised that the judge could do so as long as the judge's conduct does not appear to a reasonable person to be coercive or cast reasonable doubt on the judge's capacity to act impartially as a judge. The committee also advised that the judge could use the circuit's technology department to produce the PSAs, as long as "the use is merely incidental based on the factors outlined in this decision, and the request is made in a non-coercive manner." If the department is not able to produce the PSAs, the judge may not solicit media outlets or a public university to produce them unless those entities provide such services to anyone who requests them. The judge or court administrator may not ask media outlets to broadcast the PSAs. However, the judge provide PSAs to the DCF, which may ask media outlets to broadcast them, as long as the judge's conduct does not appear to a reasonable person to be coercive or cast reasonable doubt on the judge's capacity to act impartially as a judge.

A judge may make a public appeal for potential foster parents in a circuit or county where the vetting and training of foster parents is performed by a nonprofit agency that is reimbursed for its administrative costs, if the judge does not conduct the appeal "in a manner reasonably perceivable as coercive or casting doubt on the judge's ability to handle such cases impartially, the judge holds no personal stake in the agency in question, and the judge does not attempt to influence the distribution of training assignments." Opinion 14-23.

A judge is permitted to educate friends, family, and other members of the community about dependency court and the guardian ad litem program in an effort to secure volunteers for the program, as long as the judge's conduct "does not appear to a reasonable person to be coercive or cast reasonable doubt on the judge's capacity to act impartially as a judge." Opinion 13-09.

An administrative judge may send letters of appreciation to attorneys who have served as a pro bono guardian ad litem if the letters are general and are not signed by the judge who presided over the case for which the pro bono representation was provided, and copies should be kept in the court file and provided to the parties or

their counsel. The court may also recognize such attorneys as a group at a bar luncheon or similar function. Opinion 17-23.

10. May Judge Review or Critique Book?

In Opinion 12-34, a judge had been asked by a university editorial board to critique a book written by a defense attorney in a well-publicized criminal case. The committee advised that, although writing the critique was a permissible activity under the Code of Judicial Conduct, the better practice would be to decline the request, given the Code restrictions that would be placed on the judge in this case.

11. What Law-Related Teaching Activities May a Judge Participate In?

A judge may teach at a one-day training session for judges, magistrates, and court staff on how to deal with domestic violence issues, as long as the teaching activities do not cast reasonable doubt on the judge's ability to act impartially. Opinion 15-04 ("judge has been asked to help educate court personnel, not to join, support or endorse a private organization").

A judge may not give a private educational presentation to the summer law clerks of the judge's former law firm. Opinion 15-06 (it would give appearance of judge maintaining close ties with that firm, and it would be impossible for judge to provide same educational opportunities to any law firm that might make similar request).

12. Quasi-Judicial and Extrajudicial Activities: Questions to Ask Before Joining Organization or Serving on Committee or Board

Quasi-Judicial Activities

A. Is the organization or governmental entity devoted to the improvement of the law, the legal system, the judicial branch, or the administration of justice?

If so, then membership is regulated by Canon 4, and the express authority for serving is Canon 4D.

B. Will the organization be engaged in proceedings that will come before a judge, or will it be engaged in frequent adversary proceedings in the court of which the judge is a member or in any court subject to the appellate jurisdiction of the court of which the judge is a member?

If yes, then Canon 4D(1) probably prohibits membership, and if the judge is already a member, he or she should resign.

C. Will membership cast reasonable doubt on impartiality; will it undermine integrity, independence, or impartiality; will it demean the judicial office; will it interfere with the proper performance of judicial duties; will it lead to frequent disqualification; will it appear to a reasonable person to be coercive?

For the most part, a judge is encouraged to serve organizations devoted to improving the law, the legal system, the judicial branch, and the administration of justice. However, there are organizations that may occasionally advocate controversial legal positions about disputed matters, and the test for continued membership is whether membership could raise a reasonable doubt about a judge's impartiality or convey an impression that the organization or its supporters are in a special position to influence the judge.

Another consideration is the dignity of the organization in question. A judge should not engage in any activity that would detract from the integrity, impartiality, or performance of the judge's duties with diligence.

Finally, because of the need to devote full time to judicial duties and perform the judicial role diligently, a judge must ask whether the commitment to membership or to service in some official capacity in an organization will interfere with the proper performance of his or her judicial responsibilities.

D. Is the organization involved in fund-raising of any sort, and will the judge be called upon to participate in soliciting funds for the support of the organization?

The mere fact that an organization solicits financial support does not disqualify a judge from membership or even from service on a board. However, according to Canon 4D, a judge must not directly participate in soliciting money except that he or she may solicit funds from other judges over whom the judges does not exercise supervisory or appellate authority, and he or she may appear or speak at, receive an award or other recognition at, be featured on the program of, and permit his or her title to be used in conjunction with a fund-raising event if the event concerns the law, the legal system, or the administration of justice and the funds raised will be used for a law-related purpose.

Under Canon 2B, a judge cannot lend the prestige of office to advance the judge's

own interests or the interests of others, so he or she must be very careful to assess how the organization might use his or her name. A judge can assist the organization in planning fund-raising and in managing the funds once they are raised. A judge's name may appear on organizational letterhead along with the office held in the organization. Even judicial designation may appear on the letterhead if comparable designations (e.g., "M.D."; "Ph.D."; "Attorney at Law") are listed for other persons. A judge must not, however, write or sign a fund-raising letter. A judge may use court premises, staff, stationery, or other resources only for activities that concern the law, the legal system, or the administration of justice.

E. Are the nature and purpose of the organization changing; is it advocating new positions; are its membership rules changing; has it begun to appear in legal proceedings?

As a caveat, a judge must continually engage in the analysis of these questions. Quasi-judicial organizations devoted to improving the law, the legal system, and the administration of justice can from time to time shift focus and begin to take positions that advocate particular legal outcomes or suggest a proclivity for favoring one class of persons or potential legal parties over others. Some organizations might be viewed as having developed a plaintiff's bias, or as being pro-defense and anti-prosecutorial, or vice versa. A judge who is a member of such an entity has to maintain current knowledge of the organization's official positions and policies and must be prepared to step away if judicial integrity or impartiality could reasonably be questioned based on the judge's membership.

Extrajudicial Activities

A. What is the purpose of the organization?

If the organization is not specifically devoted to improving the law, the legal system, or the administration of justice, then membership is governed primarily by Canon 5. Because Canon 2A requires a judge to act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary, a judge must be very much aware of the mission, purpose, goals, objectives, and activities of any organization in which he or she hold membership or office.

B. Will the organization be involved in proceedings that will come before the judge, or will it be engaged in frequent adversary proceedings in the court of which the judge is a member or in any court subject to the appellate jurisdiction of the court of which the judge is a member?

If so, as in its parallel provision in Canon 4, Canon 5C(3)(a) likely precludes membership because the need for frequent recusal would interfere with the performance of judicial duties.

C. Will membership cast reasonable doubt on a judge's impartiality, demean the office, or interfere with the proper performance of judicial duties?

Canon 5A requires a judge to conduct all extrajudicial activities so that they do not cast reasonable doubt on the judge's impartiality. It is clear from reading Canon 5C(3)(a) that a judge may serve as an officer, director, trustee, or non-legal advisor of an educational, religious, charitable, fraternal, sororal, or civic organization not conducted for profit. Yet, a judge must be vigilant in monitoring organizational activities and positions that the organization might take on controversial legal or political issues.

Regarding affiliations that might demean judicial office as well as compromise judicial integrity and perception of impartiality, a judge may not maintain membership in any organization that engages in "invidious discrimination." According to the Commentary to Canon 2C, that means a judge must not join, or, if currently a member, he or she must disassociate himself or herself from, any organization that "arbitrarily excludes" persons from membership on the basis of race, religion, gender, or national origin. There is only one exception to the immediate disassociation requirement; a judge may attempt to persuade the organization to discontinue the invidiously discriminatory practices, but if he or she does not succeed in convincing the organization to abandon the practices within one year, the judge must resign.

The Canon 2B Commentary acknowledges that there are legitimate reasons for organizations to restrict membership, and it specifically mentions organizations dedicated to preserving religious, ethnic, or cultural values of legitimate common interest to members. The commentary also acknowledges the existence of "intimate, purely private organizations whose membership limitations could not be constitutionally prohibited." Although the list is not exclusive, by way of example, the commentary mentions a number of non-prohibited organizations by name, including Knights of Columbus, Masons, B'nai B'rith, Sons of Italy, Rotary, Kiwanis, the Junior League, Boy Scouts, Girl Scouts, Boy's Clubs, Girl's Clubs, United Way, and Red Cross.

As with quasi-judicial organizational involvement under Canon 4, a judge must

also ensure that commitments to extrajudicial activities under Canon 5 do not compromise the judge's ability to devote full time to performing judicial properly duties.

D. Is the organization involved in fund-raising of any sort, and will the judge be called upon to participate in soliciting funds to support the organization?

As with quasi-judicial organizational involvement under Canon 4, a judge may not personally or directly solicit funds from anyone other than another judge over whom he or she does not exercise supervision or appellate jurisdiction. A judge may assist such an organization in planning fund-raising and may participate in the management and investment of the organization's funds, but shall not personally or directly participate in the solicitation of funds, except that a judge may solicit funds from other judges over whom the judge does not exercise supervisory or appellate authority. Fla. Code Jud. Conduct, Canon 5C.

E. Are the nature and purpose of the organization changing; is it advocating new positions; are its membership rules changing; has it begun to appear in legal proceedings?

As a caveat, these are questions that a judge must ask himself or herself regularly. Numerous committee opinions advise judges to remain attuned to the changing nature of various organizations and caution judges to reconsider membership periodically based on the preceding criteria.

Chapter Seven

Personal Finances and Financial Disclosure

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Chapter Seven

Personal Finances and Financial Disclosure

1. Must Judge File Public Financial Report?

Canon 6B(1) provides that a judge must file "such public report as may be required by law for all public officials to comply fully with the provisions of Article II, Section 8, of the Constitution of Florida." The form for reporting must be the form recommended or adopted by the Florida Commission on Ethics for use by all public officials.

2. What Gifts May Judge Receive and Must Gifts Be Reported?

Canon 6 requires that a judge file a public report of all gifts required to be disclosed under Canon 5D(5). Canon 5D(5) provides that a judge must not accept a gift, bequest, favor, or loan except the following:

> (a) a gift incident to a public testimonial, books, tapes, and other resource materials supplied by publishers on a complimentary basis for official use, or an invitation to the judge and the judge's spouse or guest to attend a bar-related function or an activity devoted to the improvement of the law, the legal system, or the administration of justice;
>
> (b) a gift, award, or benefit incident to the business, profession, or other separate activity of a spouse or other family member of a judge residing in the judge's household, including gifts, awards, and benefits for the use of both the spouse or other family member and the judge (as spouse or family member), provided the gift, award, or benefit could not reasonably be perceived as intended to influence the judge in the performance of judicial duties;
>
> (c) ordinary social hospitality;
>
> (d) a gift from a relative or friend, for a special occasion, such as a wedding, anniversary, or birthday, if the gift is fairly commensurate with the occasion and the relationship;
>
> (e) a gift, bequest, favor, or loan from a relative or close personal friend whose appearance or interest in a case would in any event require disqualification under Canon 3E;

(f) a loan from a lending institution in its regular course of business on the same terms generally available to persons who are not judges;

(g) a scholarship or fellowship awarded on the same terms and based on the same criteria applied to other applicants; or

(h) any other gift, bequest, favor, or loan, only if the donor is not a party or other person who has come or is likely to come or whose interests have come or are likely to come before the judge; and, if its value, or the aggregate value in a calendar year of such gifts, bequests, favors, or loans from a single source, exceeds $100, the judge reports it in the same manner as the judge reports gifts in Canon 6B(2).

The following are summaries of relevant committee opinions:

- **Opinion 18-07** (committee discussed what must be reported on Financial Disclosure Form 6A: judge typically need not report complimentary attendance at bar association social event or other event devoted to improvement of law, legal system, or administration of justice, or small gifts from bar associations and educational organizations given as token of appreciation; need not report waiver of annual dues to county bar association judge joined before becoming judge, or honorary bar association memberships, but must report waiver of annual foreign bar fees or dues; must report complimentary admission to legal seminar where non-judges were charged fee, if amount of fee and other charges waived exceeds $100 in same calendar year; must report reimbursement or direct payment of travel expenses and tuition waivers related to attendance at legal seminar outside state, attendance at annual statewide conference of judges, or travel to Tallahassee, as court conference designee, relating to legislative matters);

- **Opinion 17-11** (judge who received $10,000 anonymous cash gift and left it with sheriff's office should disclaim any possessory interest in it);

- **Opinion 17-06** (chief circuit judge may accept donation of copiers to be used exclusively by attorneys in courtroom);

- **Opinion 17-04** (judge may accept food and drink provided by organizations and law firm that sponsor free diversity training seminar in courthouse);

- **Opinion 14-01** (judge may display art from local government's art-in-public-places program, assuming judge is not part of selection process);

- **Opinion 13-12** (general magistrate (and therefore judge) may accept and use "government rate" discount applicable to all attorneys employed by government for tickets to local legal aid organization's annual gala, but should be careful not to cause reasonable person to doubt magistrate's capacity to act impartially);

- **Opinion 10-11** (judge may retain attorney, negotiate fee reduction, and accept from former employer partial reimbursement of attorney's fee but may be required to report fee reduction as gift);

- **Opinion 09-16** (judge may exchange lesser valued sporting-event tickets with friend who is lawyer, but only if absent ticket exchange judge would disqualify self from cases involving lawyer and his firm; judge may consider aggregate value of tickets in complying with gift reporting rule);

- **Opinion 08-19** (judge may not accept invitation to hunt with former litigant's husband on land that former litigant's family controls);

- **Opinion 01-10** (judge may receive retirement or reassignment gifts, but gifts must be reported);

- **Opinion 00-20** (judge may attend law-related functions, including luncheons, to which fees are waived for judiciary);

- **Opinion 00-08** (judge is ethically obligated to instruct applicable court employees to act in manner consistent with judge's ethical duties and obligations regarding acceptance of gifts);

- **Opinion 97-36** (even if non-judge spouse has disclosed gift publicly, judge must do so as well);

- **Opinion 97-27** (judge may not accept honorary membership in Air Force Officer's Club, even if offered to all judges and city officials, reaffirming Opinion 83-05 advising against gift acceptance when it seems to be attempt to gain favor with courts);

- **Opinion 95-19** (judge may accept complimentary tickets to American Jewish Committee dinner as long as gift is reported);

- **Opinion 94-18** (judge need not report gift from father or bequest from mother's estate; gifts and bequests fall within purview of Canon 5C(4)(b)

[now Canon 5D(5)(e)], not Canon 5C(4)(c) [now Canon 5D(5)(h)]);

- **Opinion 94-12** (judge may accept $500 in gift certificates from anonymous donors and local bar association in honor of judge's retirement);
- **Opinion 93-67** (judge may accept Christmas gifts from tenant of business property judge owns, assuming tenant was not party or other person whose interests have recently come or may likely come before judge);
- **Opinion 92-16** (judge who escorts newspaper columnist to various social and civic affairs and who has his tickets paid for by newspaper should report them as prescribed by Canon 6 when cumulative value exceeds $100);
- **Opinion 92-15** (judge may not accept gift of free golf course membership from golf course developer; inquiring judge was only judge in circuit to whom gift was offered);
- **Opinion 92-07** (judge should not accept free passage on cruise ship in exchange for lecture on law or judicial system; activity would detract from dignity of judicial office and exploit judicial position);
- **Opinion 91-07** (baby shower gifts should be reported as other gifts are reported).

The most important development for judges to understand in these blanket honorary membership scenarios is that a careful reading of Opinion 97-27 shows that even if all judges are offered the same benefit, that alone is not sufficient to make acceptance of the benefit permissible. This was a possible misperception after Opinion 92-15a, which was expressly receded from in Opinion 97-27. The committee has made it clear that if an entity is attempting to gain favor, whether with an individual judge or all judges in the circuit, acceptance of the benefit is prohibited by the code, even when it is offered across the board to all judges in a geographic area.

3. May Judge Accept Honorarium for Presenting Lecture?

Canon 6 provides that a judge may receive compensation for extrajudicial activities permitted by the code if the source of payment does not give the appearance of influencing the judge in the performance of his or her duties or give the appearance of impropriety. The compensation may not exceed a reasonable amount or what a person who is not a judge would receive for the same activity. *See* Opinion 92-45

(judge may lecture at legal seminar scheduled during normal court hours and sponsored by private corporation if judge can show why that time of lecture would not detract from proper performance of judicial duties and can also show that judge is devoting full time to judicial duties; judge would be paid honorarium, and judge's expenses would be covered); Opinion 07-09 (judge may participate in panel discussion as part of continuing education seminar sponsored by private, for-profit organization and may receive compensation and allow his photo and biographical profile to be used in advertising seminar); Opinion 07-15 (judge who is member of canvassing board may accept reimbursement from elections supervisor for expenses for seminar on elections law).

4. May Judge Serve as Officer or Employee of Business?

A judge may, subject to the requirements of the code, manage and participate in a business closely held by the judge or members of the judge's family or a business entity primarily engaged in investment of the financial resources of the judge or members of the judge's family. Fla. Code Jud. Conduct, Canons 5D(3)(a) and (3)(b). *See* Opinion 90-14 (serving as paid consultant who evaluates profit-making enterprise's drug rehabilitation and related activities outside county in which judge sits is not permitted because service would violate Canon 5C(2)).

A notable committee opinion is Opinion 95-04, in which the inquiring judge asked whether it was permissible to sell Amway products. The committee stopped short of a complete prohibition of such activity, but relying on the reasoning of an earlier opinion dealing with a judge who wished to offer his boat for charter fishing, the committee suggested five critical time, place, and manner restrictions that are pertinent to any "for-profit" venture a sitting judge might wish to consider. The restrictions are:

1. No solicitation allowed from lawyers who practice before the judge;

2. No use of judicial title permitted in connection with the business venture;

3. No use of court time or equipment allowed for the venture, which must also be conducted on personal time after hours, on the weekends, or during vacations;

4. No fees or rates for products or services may be charged that are not competitive or at the prevailing rate that a non-judge would charge for similar work; and

5. No transactions may be omitted from the full public financial disclosure required by Canon 6B(1).

A number of other opinions address extrajudicial employment and demonstrate the need to consider each business or employment opportunity carefully on a case-by-case basis:

- **Opinion 17-05** (senior judge may serve as court-appointed litigant-paid independent investigator in shareholders' derivative action in circuit where senior judge does not preside, but must disclose such service and/or refrain from presiding over cases involving certain parties, lawyers, and law firms);
- **Opinion 16-22** (senior judge may not work part time for insurance adjusting company as insurance umpire in any circuit in which senior judge may preside);
- **Opinion 16-18** (judge may not serve as litigant-paid special magistrate in circuit in which judge presides as senior judge);
- **Opinion 16-17** (judge may not own interest in, be employed by, or be compensated for services provided by closely held business with person who is not member of judge's family, nor may judge be employed by business judge's spouse owns interest in with person who is not member of judge's family);
- **Opinion 16-12** (judge may not work for for-profit company on commission basis securing potential investors);
- **Opinion 10-27** (judge may provide free seminar to provide lawyers with information about how to present cases to judges);
- **Opinion 09-05** (judge may sit as senior judge and traffic hearing officer in same judicial circuit);
- **Opinion 08-25** (judge may serve as officer or director of closely held family corporation and may receive compensation from corporation based upon percentage of value of property to be sold);
- **Opinion 07-01** (part-time traffic hearing officer may rent office space from law firm handling traffic matters and may work for firm as independent contractor on non-traffic cases);

- **Opinion 06-32** (judge must direct judicial assistant not to work after hours cleaning offices of attorneys likely to appear before judge);

- **Opinion 06-02** (senior judge may work for newspaper but may not own interest in newspaper for which ownership interest will require judge to manage newspaper);

- **Opinion 03-21** (advising judge against service on board of trustees of community college because it is government service not related to law, legal system, or administration of justice);

- **Opinion 02-17** (advising judge that it is permissible to be president of non-profit civic organization promoting cultural events for county);

- **Opinion 01-16** (disapproving service as appointed member of commission of municipal government charged with fiscal management of government funds);

- **Opinion 01-07** (approving service on board of advisors for publication dedicated to criminal justice system and mentally ill, which position is unpaid and is related to practice of law and improvement of legal system);

- **Opinion 00-09** (judge may serve as board member for non-profit corporation as long as not involved in fund-raising);

- **Opinion 97-35** (advising against service as part-time director in for-profit corporation);

- **Opinion 95-45** (warning against serving on credit union board of directors);

- **Opinion 95-31** (advising inquiring judge not to serve as bank director).

5. May Judge Practice Law?

A judge may not practice law. However, a judge may act pro se and may, without compensation, give legal advice to and draft or review documents for members of the judge's family. Fla. Code Jud. Conduct, Canon 5G. Article V, section 13, of the Florida Constitution provides that judges must devote full time to their judicial duties and may not engage in the practice of law or hold office in any political party.

- **Opinion 15-07** (judge may serve as corporate officer of professional

association of judge's deceased spouse's solo law practice for purpose of filing annual report, which was necessary step toward closing law practice).

- **Opinion 13-13** (judge may not use judge's former law office, in building where judge's family's law firm still practices, during nonbusiness hours to perform personal and court-related work).

- **Opinion 13-11** (judge may send former client letter stating that judge can no longer practice law; although judge may not generate new documents or discuss legal significance of existing documents, judge may furnish client copies of documents already in file).

- **Opinion 12-28** (part-time civil traffic infraction hearing officer may practice law in same circuit where office resides if practice does not include traffic matters, but judge in case where officer represents party should disclose officer's position because reasonable person could consider scope of professional relationship between judge and hearing office relevant to question of disqualification).

- **Opinion 12-10** (retired judge eligible for temporary judicial duty may not mentor a law firm's associates in effective trial practice or help firm develop statewide and multi-state ADR programs; this would violate prohibition against senior judge "associating with an entity that engages in the practice of law" even if judge refused judicial assignments while association with firm is ongoing).

- **Opinion 07-02** (former judge may remain beneficiary of land trust along with former law partners but must dispose of any interest judge owns jointly with lawyers likely to appear before him or her and must disqualify in cases in which former partners and co-beneficiaries of land trust are involved).

- **Opinions 06-31**, **09-09** (judge may collect fees for legal representation done before he or she took bench).

- **Opinion 06-05** (judge may retain memberships in federal court bars, albeit without practicing in federal court while on state bench).

- **Opinion 06-03** (part-time child support enforcement hearing officer may represent indigent prisoners who have filed post-conviction relief motions in the circuit in which hearing officer presides).

- **Opinion 05-19** (advising judge that he or she may not discuss former client's pending cases with judge's former law partner or with client's new lawyers).

- **Opinion 05-18** (advising retired judge, not subject to recall, that he may represent himself and give legal advice to his spouse regarding appeal to district court of appeal or motion hearing in trial court).

6. May Judge Manage His or Her Family's Financial Investments?

A judge may, subject to the requirements of the code, hold and manage investments of the judge and members of his or her family, including real estate, and engage in other remunerative activity subject to the restrictions of the code. Fla. Code Jud. Conduct, Canon 5D(2).

- **Opinion 17-13** (judge may serve as executor of estate, guardian, and/or trustee on behalf of sister and brother-in-law if doing so would not interfere with proper performance of judicial duties or pose likelihood of litigation before court on which judge serves).

- **Opinion 17-12** (judge may serve as co-trustee of irrevocable trust created by brother-in-law, who resides in Florida but not in circuit where judge presides, and with whom judge maintains close familial relationship).

- **Opinion 09-18** (judge may serve as trustee of trust created by judge's grandfather for benefit of judge's uncle).

- **Opinion 08-25** (judge may serve as officer or director of closely held family corporation and may receive compensation from corporation based upon percentage of value of property to be sold).

7. Are There Restrictions on Judge's Financial and Business Dealings in Addition to Those Restrictions on Businesses or Membership Discussed Above?

A judge is prohibited from engaging "in financial and business dealings that (a) may reasonably be perceived to exploit the judge's judicial position, or (b) involve the judge in frequent transactions or continuing business relationships with lawyers or other persons likely to come before the court on which the judge serves." Fla. Code Jud. Conduct, Canon 5D(1). *See In re DeFoor*, 494 So. 2d 1121 (Fla. 1986) (judge reprimanded publicly for several incidents, including using office and

authority to promote electronic device for personal gain); Opinion 14-27 (judge may maintain ownership interest in business entity that owns building leased to members of judge's former law firm as long as judge is disqualified from any cases involving that firm and business relationship does not lead to excessive number of such disqualifications); Opinion 11-02 (judge who owns residential mortgages on properties and receives income from those properties may handle mortgage foreclosure matters); Opinion 99-07 (allowing fiduciary service and reasonable compensation for estate of judge's wife's grandmother); Opinion 90-11 (judge may be paid in capacity as co-personal representative and co-trustee in estate arising from father's death; judge may receive commissions from family-owned real estate business in which judge participated as licensed broker as result of transactions that occurred before judge assumed bench, but judge may not maintain active real estate license); Opinion 90-01 (judge should not enter into lease arrangement with governmental agency, but may sell property to governmental agency).

8. May Judge Serve as Fiduciary?

Canon 5E(1) and committee opinions hold that a judge is prohibited from acting as a fiduciary except for the estate, trust, or person of a member of the judge's family, and then only if such service will not interfere with the proper performance of judicial duties. A judge is prohibited from serving as a fiduciary if it is likely that the judge, as a fiduciary, will be engaged in proceedings that would ordinarily come before the judge, or if the estate, trust, or ward becomes involved in adversary proceedings in the court on which the judge serves or one under its appellate jurisdiction. Fla. Code Jud. Conduct, Canon 5E(2). The restrictions on financial activities that apply to a judge personally apply to the judge while acting as a fiduciary. Fla. Code Jud. Conduct, Canon 5E(3). A number of opinions address the restrictions on fiduciary service:

- **Opinion 14-22** (senior judge may, as personal representative of spouse's estate, in order to close deceased spouse's solo practice, hire staff to bill accounts receivable, become signor on firm's operating and trust accounts, hire attorney if necessary, and purchase tail insurance for Professional Association).

- **Opinion 12-05** (judge may appear as guardian of judge's minor children at mediation in contested probate estate but "should make clear to all parties however, that the judge's appearance at mediation is as guardian and not as attorney, advocate or negotiator, for the children");

- **Opinion 00-01** (judge may serve as trustee over property left to judge and

his wife as life estate);

- **Opinion 97-04** (judge may not continue to serve as guardian of property for physically disabled man);

- **Opinion 95-07** (judge may serve as co-trustee of estate of wife's grandmother and be paid reasonable fee);

- **Opinion 93-02** (judge may serve as co-trustee of charitable trust created, funded, and named after judge and her spouse, assuming trust was not conducted for benefit of judge or family member and would not be involved in adversary proceedings; service must not reflect adversely on judge's impartiality or interfere with performance of judicial duties);

- **Opinion 92-18** (judge may not serve with husband as co-trustee of trusts created for benefit of adult daughter of close friends; such service would violate Canon 5D (now Canon 5E(1)), which prohibits judge from serving as trustee except for close family members);

- **Opinion 90-11** (judge may be paid in capacity as co-personal representative and co-trustee in estate arising from father's death).

There is dispute over whether an ex-spouse and family constitute enough relationship to be considered as part of the judge's family, but a majority of the committee was of the view that the family of a judge's ex-spouse is not the same as the judge's family. *See* Opinion 03-12.

9. May Judge Serve as Arbitrator or Mediator?

A judge is prohibited from acting as an arbitrator or mediator or otherwise performing judicial functions in a private capacity unless expressly authorized by law or court rules. Fla. Code Jud. Conduct, Canon 5F. A retired judge who is eligible for recall to judicial service is not required to comply with Canon 5F. There are restrictions on a retired judge eligible for recall to judicial service serving as a mediator. Opinion 10-35 (retiring judge may not permit mediation firm to send out announcement, prior to judge's retirement, that judge is joining firm); Opinion 07-12 (senior judge may not advertise mediation service to unrepresented persons in publications not directed to lawyers); Opinion 02-01 (judge advised not to mediate friend's divorce). Previously, sitting judges and retired judges eligible for recall could not co-mediate. Opinion 96-07 (judge advised not to co-mediate until after judicial retirement). Although Opinion 96-07

was reaffirmed by the committee in Opinion 97-05, the Florida Supreme Court addressed the issue of judges co-mediating in its opinion *In re Code of Judicial Conduct, Canon 5F*, 695 So. 2d 352 (Fla. 1997). In that opinion, the court found that Canon 5F allows judges, subject to certain rules, to conduct actual arbitration or mediation proceedings as part of a certification process. Since the court's ruling in this opinion, the committee has applied the same rationale to judicial employees. *See* Opinion 00-13 (restrictions on judge mediating or arbitrating must also apply). A general magistrate may not offer family mediation services in an adjoining county. Opinion 10-26. A judge may not preside over a trial of a civil case when the judge is providing mediation services in the same circuit in the same type of case. Opinion 09-10. A judge may remain a certified circuit court mediator, albeit without practicing as a mediator, while on the bench. Opinion 06-05.

Although formerly a senior judge could mediate cases in a federal court located in a circuit in which the judge presided, because it was a different type of case and different type of court, in Opinion 14-21 the committee advised that its interpretation of the changes made to the Code of Judicial Conduct in *In re Amendments to Code of Judicial Conduct; Florida Rules for Certified and Court-Appointed Mediators; Florida Rules of Civil Procedure; the Florida Rules of Judicial Administration; Florida Rules of Juvenile Procedure; and Florida Family Rules of Procedure – Senior Judges as Mediators*, 141 So. 3d 1172 (Fla. 2014), prohibit a senior judge from serving as a mediator in *any* case — federal or state — in a circuit in which a senior judge is presiding as a judge. Effective October 1, 2016, the Code was amended to extend the same prohibition against a senior judge serving as an arbitrator or voluntary trial resolution judge in a circuit in which the judge is presiding. *In re Amendments to Code of Judicial Conduct–Senior Judges Serving as Voluntary Trial Resolution Judges and Arbitrators*, 194 So. 3d 1015 (Fla. 2016).

A senior judge may not mediate cases arising out of appeals from the circuit where the judge presides, even though the District Court of Appeal hearing the appeals is headquartered outside the circuit. Opinion 15-08. A senior judge may serve as an appellate mediator if the case arises from the appeal of a case within the appellate court's jurisdiction, but from outside of the state judicial circuit where the inquiring judge serves as senior judge, "if restrictions regarding geography and subject matter are not implicated; certification requirements are met; and doing so would not result in an appearance of or the potential for impropriety." Opinion 15-15. A senior judge may not serve on any case, including an appellate case pending in a District Court of Appeal, that originated in the judicial circuit where the senior judge currently provides arbitration services. Opinion 17-07. A senior judge may

not serve as a litigant-paid special magistrate in a circuit in which the judge is currently presiding as a senior judge. Opinion 16-18.

10. May Judge Accept Fee Earned Before Assuming Bench?

A judge may accept a fee earned before assuming the bench. Opinion 13-04 (judge may collect contingent fee for matter on which judge worked, and for which judge secured offer of settlement, before becoming judge); Opinion 13-01 (judicial appointee may sell interest in law practice and collect payments while sitting as judge, but payments for goodwill must be based on fixed sum at reasonable rate of interest and not on formula taking into account fees earned in pending matters); Opinion 09-09 (permissible to receive fee on legal work performed prior to assuming bench, as long as computation of fee is based on traditional standards); Opinion 95-11 (finding it permissible to accept fees in quantum meruit for services rendered before becoming judge, but not while judge); Opinion 94-07 (proper to accept fee earned before assuming bench if division of fees is in compliance with Rules of Professional Conduct (now Rules Regulating The Florida Bar)); Opinion 93-38 (permissible to continue to receive compensation for legal work performed before taking bench if compensation or fees are for work previously performed; judge may collect fair value of interest in fees to be collected in future for work done before departure from firm, but should not be sharing in profits of firm earned after departure; inquiring judge's reference to intangible factor of goodwill associated with new judicial reputation in community was unclear; five members of committee said judge should not profit from judicial standing in community).

11. May Judge Teach Class at Academic Institution?

A judge may teach a class about the law (Canon 4B) or a non-legal subject (Canon 5B) and may do so for compensation as long as it does not detract from full time judicial duties and as long as the compensation received does not exceed a reasonable amount and is no greater compensation than a non-judge would receive for the same work. *See* Opinion 81-03 and Fla. Code Jud. Conduct, Canon 6A(1).

12. May Judge Publish Book?

A judge may publish a work of fiction or non-fiction on any subject, including crime, so long as the publication does not cast reasonable doubt on the judge's capacity to act impartially as a judge; demean the judicial office; or interfere with the proper performance of judicial duties. *See* Opinions 10-12, 98-01, 89-06. The judge may participate in a book signing, have his or her photograph published on the book's author page, and allow mention in a press release that the author is a

judge. *See* Opinion 10-12, citing Canons 5A and 5B. A judge may publish a blog that reports cases "where the entries are intended to be neutral, nonjudgmental, brief summaries of the facts and holdings." The judge would not evaluate the opinion but merely alert readers to the cases and court rule changes. Opinion 12-07.

13. May Judge Receive Compensation for Performing Wedding Ceremony?

By virtue of judicial office, judges may officiate at marriage ceremonies. In Opinion 83-15, the committee also determined that a judge who performs a wedding may receive reasonable compensation as long as the judge does not allow presiding at weddings to detract from full time judicial responsibilities. A judge may not accept compensation for performing marriages during normal working hours at the courthouse. As with any permitted extrajudicial compensation, the compensation must be reasonable and no greater than the compensation a person who is not a judge would receive for the same activity. Fla. Code Jud. Conduct, Canon 6A(1).

14. Other Than Practice of Law, Are There Other Activities for Compensation from Which Judge Should Refrain?

The answers to questions 4–8 above cover such matters as a judge's business ownership, the practice of law, management of the judge's personal investments, various personal financial transactions, and service as a fiduciary. This answer will suggest a method for evaluating the judicial ethics implications of any remunerative activity in which a judge might wish to engage. Judges must use a rule of reason and read several provisions of Canons 2 through 6 and the Florida Constitution in para materia:

First, in accordance with article V, section 13, of the Florida Constitution, every Florida jurist must devote full time to judicial duties. Consistently with that section, Canon 3A holds that judicial duties take precedence over all the judge's other activities. And, in light of Canon 3B(8), any activity that would prevent a judge from disposing of all judicial matters "promptly, efficiently, and fairly" must be avoided. Judges must also take care that any other activity, whether for compensation or not, does not undermine the judge's independence, integrity, or impartiality, does not cast reasonable doubt on the judge's ability to remain impartial, does not demean the judicial office, does not interfere with the performance of judicial duties, does not lead to frequent disqualification of the judge, and does not appear to a reasonable person to be coercive. Fla. Code Jud. Conduct, Canon 4A.

Teaching is a frequent activity for judges, some of whom teach courses about the law, the legal system, and the administration of justice at community colleges, undergraduate universities, or law schools. Such activity is expressly allowed by Canon 4B. Similarly, Canon 5B recognizes that judges may also have expert knowledge in non-legal academic subject matter and may teach non-law related courses. Still, judges must consider each prospective teaching or lecturing assignment carefully and do nothing to demean or detract from the dignity of office or imply any impartiality that could cause the public to question the judge's ability to hear and decide cases without favoritism or bias. In Opinion 08-21, the committee advised that a judge may plan and teach a trial skills course sponsored by a state agency but may not recruit lawyers to teach the course if doing so might be perceived as coercive. A judge may preside over a mock trial sponsored by local law enforcement but is advised not to offer any critique about the performance of law enforcement or how members of law enforcement can improve their presentation in a courtroom setting. Opinion 18-01.

Canon 6A allows acceptance of reasonable compensation for nonjudicial tasks. In no case may a judge participate in any arrangement or receive compensation for an activity that creates a conflict of interest or that appears to trade on the judicial position for personal advantage. Canon 6A also warns that the source of payment must not raise questions of undue influence.

In Opinion 10-01, members advised that a judge may not rent a room in judge's home to a non-related person who is on community control.

In Opinion 96-25, members advised an inquiring judge not to serve as a legal commentator for a local television station. Citing Canons 2B, 3B(8), 5A, and 5D(1)(b), the committee warned that such an arrangement with an electronic media outlet might lend the prestige of office to the station's commercial interest (violating Canon 2B), create the almost unavoidable hazard of putting the judge in the position of appearing to give legal advice or commentary on pending matters (Canon 3B(8)), or cast doubt on the judge's impartiality or demean the judicial office (Canon 5A). The committee also discussed its concern that involvement in commercial and entertainment-related aspects of the business could outweigh any educational and public information-related purposes of the commentary. Additionally, the committee addressed the Canon 5D(1)(b) consideration that the electronic media are frequently litigants and are likely to come before the court. This analysis employed in Opinion 96-25 is applicable to other prospective activities and should prove helpful in determining whether to engage in them. *See, e.g.*, Opinion 06-22 (judge may not accept reimbursement for expenses incurred

for presiding over depositions in foreign country); Opinion 92-07 (advising judge that acceptance of free passage on cruise in exchange for lecture would detract from dignity of office and exploit judge's position in violation of Canons 5A and C); Opinion 90-14 (opining that work as consultant for drug company would be prohibited by Canon 5); Opinion 78-10 (cautioning judge not to appear voluntarily as expert witness and not to accept compensation for testifying).

Essentially, by incorporating the language of the canons and the reasoning of the committee opinions discussed throughout this chapter, a judge can deduce eight relevant factors to weigh in deciding whether to engage in an extrajudicial or quasi-judicial activity with or without compensation. If the answer to any one of the following eight questions is yes, then the judge must decline to engage in the activity. The eight factors are:

1. whether the activity will detract from full time duties;

2. whether the activity will call into question the judge's impartiality, either because of comments reflecting on a pending matter or comments construed as legal advice;

3. whether the activity will appear to trade on judicial office for the judge's personal advantage;

4. whether the activity will appear to place the judge in a position to wield or succumb to undue influence in judicial matters;

5. whether the activity will lend the prestige of judicial office to the gain of another with whom the judge is involved or from whom the judge is receiving compensation;

6. whether the activity will create any other conflict of interest for the judge;

7. whether the activity will cause an entanglement with an entity or enterprise that appears frequently before the court; and

8. whether the activity will lack dignity or demean judicial office in any way.

Chapter Eight

Political Activity

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Chapter Eight

Political Activity

1. What Are Sources of Authority and Guidance Regarding Judge's Political Activity?

A separate publication entitled "An Aid to Understanding Canon 7" has been developed by the Office of the State Courts Administrator in conjunction with the Judicial Ethics Advisory Committee. The booklet is available online at http://www.flcourts.org/core/fileparse.php/304/urlt/canon7update.pdf. Judges and candidates or applicants for appointment to judicial office should read that booklet.

Some sources of primary authority and guidance regarding permissible political activity of judges and candidates to judicial office also include the following:

a. Canon 7, Florida Code of Judicial Conduct.

b. Florida Supreme Court opinions relating to Canon 7.

c. The Florida Election Code, Florida Statutes - Judicial candidates are subject to the Florida Election Code (chapter 97, Florida Statutes, chapter 98, Florida Statutes, chapter 99, Florida Statutes, chapter 100, Florida Statutes, chapter 101, Florida Statutes, chapter 102, Florida Statutes, chapter 103, Florida Statutes, chapter 104, Florida Statutes, chapter 105, Florida Statutes, and chapter 106, Florida Statutes). Chapter 105, Florida Statutes, concerns qualifying and election procedures. Chapter 106, Florida Statutes, regulates campaign financing.

d. Opinions of the Judicial Ethics Advisory Committee - These opinions have been published in the Florida Law Weekly Supplement since December 1993. Opinions rendered before March 1994 are available for reference at the Florida Supreme Court Library and may be in local courthouse libraries. All the opinions of the committee are now available at http://www.floridasupremecourt.org by first selecting Court Opinions, then clicking JEAC Opinions under the "Judicial Ethics" heading, and through the Sixth Judicial Circuit's website at http://www.jud6.org/LegalCommunity/LegalPractice/opinions/jeacopinions/jeac.html.

The Office of the State Courts Administrator also has information about obtaining copies of these opinions.

e. Opinions of the Florida Division of Elections - The Division of Elections is authorized by rule 1S-2.010, Florida Administrative Code, to give advisory opinions regarding the application of Code (chapter 97, Florida Statutes, chapter 98, Florida Statutes, chapter 99, Florida Statutes, chapter 100, Florida Statutes, chapter 101, Florida Statutes, chapter 102, Florida Statutes, chapter 103, Florida Statutes, chapter 104, Florida Statutes, chapter 105, Florida Statutes, and chapter 106, Florida Statutes). Candidates for judicial office may request and receive such advisory opinions if they inquire in accordance with the instructions contained in rule 1S-2.010(4), Florida Administrative Code. Advisory opinions may be found at http://election.dos.state.fl.us/opinions/TOC_Opinions.shtml.

2. Who Must Comply with Canon 7?

A judge or judicial candidate must comply with Canon 7.

3. May Judge or Judicial Candidate Attend Political Gatherings?

A judge or judicial candidate may not attend political party functions except as authorized in Canons 7B(2), 7C(2), and 7C(3). Fla. Code Jud. Conduct, Canon 7A(1)(d). Canon 7B(2) permits a non-judge candidate for appointment to judicial office to attend political gatherings. Canon 7C(2) provides that upon certifying that his or her candidacy has drawn active opposition, a candidate for merit retention in office may thereafter campaign in any manner authorized by law, subject to the restrictions of Canon 7A(3). Canon 7C(3) provides as follows:

> A judicial candidate involved in an election or re-election, or a merit retention candidate who has certified that he or she has active opposition, may attend a political party function to speak in behalf of his or her candidacy or on a matter that relates to the law, the improvement of the legal system, or the administration of justice. The function must not be a fund raiser, and the invitation to speak must also include the other candidates, if any, for that office. The candidate should refrain from commenting on the candidate's affiliation with any political party or other candidate, and should avoid expressing a position on any political issue. A judicial candidate attending a political party function must avoid conduct that suggests or appears to suggest support of or opposition to a political party, a political issue,

> or another candidate. Conduct limited to that described above does not constitute participation in a partisan political party activity.

Several committee opinions help to navigate this section. Especially important is the insight into the issue of the invitation to speak at a political party function needing to include the other candidates. *See* Opinion 03-13. In that opinion, the committee said a blanket invitation in a political party newsletter was sufficient to allow the candidate to appear. If unable to attend, the judicial candidate may send a representative to speak on his or her behalf. Opinion 12-20 (Election). If a judge or judicial candidate attends a political party meeting, the committee has advised that attendance should be to speak on behalf of the judge's candidacy, not to socialize informally. *See* Opinions 02-08 (Elections) and 90-16. A judge may not attend functions of a community-organizing project of a political party, unless such conduct complies with Canon 7C(3). Opinion 10-20 (Election). The candidate should not pay for a table at, or an advertisement in the program of, an event sponsored by a political party, even if the event sponsor states that the event is not a fund-raiser. Opinion 14-08. A judicial candidate may attend a gathering sponsored by a group that claims no party affiliation but describes itself as "conservative," at which an attendance fee is charged solely to defray the event costs and all candidates for the same office are not guaranteed an opportunity to attend and speak, unless the organization is "political" as defined by the Code. If the organization is "political," the candidate may attend "only if (1) all judicial candidates are allowed to attend without purchasing a table, and (2) all judicial candidates are invited to speak and are guaranteed equal time to do so." Opinion 16-08 (Election).

A judge may attend an inauguration or inaugural ball, as long as the judge is careful not to otherwise violate the Code, because it does not "constitute attendance at a political party function. Rather, [it] is open to members of all political persuasions; it is a national celebration for the entire country." Opinion 16-21. A judge up for re-election, who has no declared opponent, may attend and address the audience at an event sponsored by a nonpartisan group promoting minority voting when all candidates are invited to speak in favor of the candidate's election, even if the organization publicizes a list of both partisan and nonpartisan candidates it recommends for election. But a judge may not meet with members of a partisan political party club before the club's meeting, nor can the candidate attend a holiday party hosted by a partisan political party, even if no party business will take place and no speakers will appear. 17-25 (Election).

The committee has also given guidance on appropriate arrival and departure timing

for attendance at a political gathering. In Opinion 02-11 (Elections), the committee advised a candidate that it was acceptable to attend, hand out campaign literature, and speak with the audience. The candidate may arrive at a reasonably early time but must leave when the portion of the meeting devoted to speaking on behalf of candidacy is concluded.

QUICK REFERENCE GUIDE FOR ATTENDANCE AT POLITICAL GATHERINGS

(Questions 4–8)

4. As General Rule, May Sitting Judge Attend Political Gatherings?

No. *See* Canon 7A(1)(d).

5. May Sitting Judge Involved in Contested Election Attend Political Gatherings?

Yes, subject to the following six restrictions:

- If a judge is involved in a contested election, he or she may attend a political party function to speak on behalf of his or her own candidacy or to speak about the law, the improvement of the legal system, or the administration of justice.
- The function must not be a fund-raiser.
- The invitation to speak must include all other candidates, if any, for that office.
- A judge should avoid commenting on his or her own political party affiliation or affiliation with any other candidate.
- A judge should avoid expressing a position on any political issue.
- A judge should avoid conduct that suggests or appears to suggest support of or opposition to a particular political party, a political issue, or another candidate.

Canon 7C(3). However, the candidate should not attend a candidates' forum held by a partisan political organization if the candidate is seeking the organization's

endorsement or the organization has indicated it will endorse a candidate. Opinion 12-25 (Election).

6. May Appellate Judge Standing for Merit Retention Attend Political Gatherings?

A judge who has certified that he or she has drawn active opposition may attend political gatherings subject to the same six limitations in B above. If a judge has not drawn opposition, he or she should not attend such gatherings even if he or she is on the merit retention ballot.

7. May Attorney Running for Judicial Office Attend Political Gatherings During Campaign?

According to Canon 7E, an attorney who is a candidate for judicial office is subject to rule 4-8.2(b), Rules Regulating The Florida Bar, and must also comply with Canon 7. *See* Opinion 10-30 (non-judge judicial candidate may attend nonpartisan candidates' forum and pay for table from which to distribute campaign literature even if the forum is fund-raising event for sponsoring organization; *but see* Opinion 11-15). A non-judge candidate may pay a sponsorship fee to attend a conference of a nonpartisan organization, pass out literature, and speak on behalf of his or her candidacy. Opinion 12-23 (Election) (whether event was fund-raiser is irrelevant because Canon 7 – only canon applicable to non-judge candidate – would not be violated as organization is not political party and conference is not partisan event). A judicial candidate may not attend a "make-up" political forum where candidates who attended earlier forum are not invited. Opinion 16-10 (Election).

8. May Non-Judge Seeking Judgeship Through the Appointment Process Attend Political Gatherings?

Yes. Canon 7B(2) specifically allows attendance of political gatherings by a non-judge applicant for appointment. A judge applicant for appointment to a vacancy or newly created judgeship at another tier of court may not attend political gatherings, however, because a judge is bound by the general prohibition of Canon 7A(1)(d) referenced in A above.

9. May Judge Solicit Funds in Support of Judge's Own Candidacy?

Canon 7B(1) provides that a candidate for appointment to judicial office or a judge seeking other governmental office may not solicit or accept funds – personally, through a committee, or otherwise – to support his or her candidacy. Canon 7C(1)

provides that a candidate, including an incumbent judge, for a judicial office that is filled by public election between competing candidates may not personally solicit campaign funds or solicit attorneys for publicly stated support. *See* Opinion 04-07 (Election). A judge may not send invitations, via e-mail or other means, to a fund-raiser for his or her judicial campaign and may not encourage invitees to attend such events. Opinion 10-14 (Election). A judge may contribute to a public broadcasting station which will thank the judge on air but the judge may not personally host a website or Facebook page promoting his or her judicial campaign. Opinion 10-28. A judicial candidate's campaign website may not contain the campaign treasurer's photograph with information about how to contribute to the campaign. Opinion 10-21 (Election). *See* Opinion 12-01 (Election), Opinion 12-15 (Election), and Opinion 12-17 (Election). A judge who is his or her own campaign treasurer may, however, collect contributions from a post office box, record them, and deposit them in the campaign account, which are just ministerial rather than fund-raising acts. Opinion 12-17 (Election). This is distinguished from a judicial candidate personally receiving an unsolicited campaign contribution, which is not permitted. Opinion 17-26 (Election).

A judge may not accept campaign contributions from a candidate running for nonjudicial office or an officer in a local political party organization, but a "committee of responsible persons established to secure funds for the campaign" may accept the contributions. Opinion 12-01 (Election) (distinction between soliciting and accepting contribution "blurs in the context of a campaign" and candidate should be insulated from all aspects of fund-raising).

A judicial candidate may personally solicit voters' signatures on petition cards to be submitted at qualifying time instead of a filing fee, if the procedure used by the candidate does not include personal solicitations from attorneys or people appearing in court before the judge. Opinion 18-04.

10. Who May Solicit Campaign Funds for Judicial Candidacy?

Canon 7C(1) provides that a judge or judicial candidate subject to public election may establish committees of responsible persons to secure and manage the expenditure of funds for the candidate's campaign and to obtain public statements of support for his or her candidacy. *See* Opinion 04-07 (Election). In Opinion 18-16 (Election), the committee stated: "An individual who solicits a contribution must be a member of the committee of responsible persons. Whether such individual may be compensated based on a percentage of the contributions received through his or her individual efforts is not addressed in the Canons."

A judge's relatives, other than those in a "close familial relationship," may solicit contributions and endorsements in support of judge's election. Opinion 10-16 (Election). A judicial candidate's spouse may belong to a political party executive committee and also campaign for the judicial candidate at non-political functions but must avoid partisan politics in the judicial campaign. Opinion 10-22 (Election). The spouse may attend a political party function, but the judicial candidate "must encourage the spouse not to campaign at the event, which would include wearing a campaign badge or otherwise being identified as the candidate's spouse." Opinion 12-06 (Election). A judicial candidate may not have a volunteer campaign manager who is an officer of a political party. Opinion 10-21 (Election). A candidate may retain a campaign management firm that has an owner or principal who holds an executive position in a partisan organization, if the candidate takes all necessary steps to ensure that the firm does not use the resources, facilities, or materials of the partisan political organization while working on the judicial candidate's behalf. Opinion 18-20 (Election).

The committee of responsible persons may hold an event at the home of the candidate's parents at which campaign funds will be solicited, and may solicit funds in a flyer promoting the event, but the candidate and his or her parents must "remove themselves from the party when the solicitation occurs." Opinion 12-14 (Election).

Neither the candidate nor the committee of responsible persons may solicit contributions for an electioneering communications organization (ECO) to be used to support the candidacy of the judicial candidate or oppose the candidacy of the judicial candidate's opponent, nor may the candidate coordinate his or her campaign activities with an ECO. Opinion 16-15 (Election).

11. When May Judicial Candidate Subject to Public Election Establish Campaign Committee?

Canon 7C(1) formerly prohibited a candidate from establishing a campaign committee or expending funds earlier than one year before the general election. (Previously, there had been no time limit on the establishment of a campaign committee or on the expenditure of funds in furtherance of a judicial campaign.) However, this restriction was enjoined by the United States District Court for the Northern District of Florida in *Zeller v. The Florida Bar*, 909 F. Supp. 1518 (N.D. Fla. 1995), and the Florida Supreme Court deleted the time-restrictive language from Canon 7C(1) in *In re Code of Judicial Conduct*, 659 So. 2d 692 (Fla. 1995).

12. May Judicial Candidate Publicly Endorse Another Candidate for Public

Office?

Under Canon 7A(1)(b), a judicial candidate may not publicly endorse another candidate for public office. This prohibition is not violated if the judge publishes an endorsement from a lawyer who publicly endorsed another candidate in a different race, nor is the lawyer prohibited from co-hosting a fund-raiser to benefit the judge. Opinion 13-21. This prohibition also applies to a judge whose spouse is a candidate for an elected partisan office. Opinion 17-18.

A judge may not accept endorsement from a nonjudicial candidate for elected office. Opinion 10-14 (Election). However, a judge may accept endorsement from a nonjudicial elected official who is not campaigning for election, if the "partisan aspects of the official's position are not mentioned." Opinion16-09 (Election); Opinion 14-11 (Election); Opinion 12-18 (Election); Opinion 10-14 (Election). This is not the case if the nonjudicial elected official is opposed by an individual who qualified as a write-in candidate. Opinion 12-21 (Election) (committee distinguished situation from that in Opinion 12-18 (Election)). A judge may personally solicit the support and endorsement of public officials and citizens in the community, as long as the public official is not also campaigning for reelection and the endorsements "comply with the requirements of the Canons to maintain the dignity appropriate to judicial office and in a manner so as not to call into question the impartiality, integrity, and independence of the judiciary." Opinion 17-14 (Election). A judge may accept and advertise support or endorsement from former judicial candidates whom the judge defeated in the recent primary election cycle. Opinion 18-24 (Election).

A judge may use as a campaign consultant a sitting member of a county commission who is not currently running for office or asserting a political party view in support of other nonjudicial or judicial candidates. Opinion 10-18 (Election). Judicial candidates who are running in different races may travel together to campaign speaking events if they do not create the impression that they are working together or are endorsing each other, and as long as the vehicle does not display either candidate's campaign advertising. Opinion 11-20 (Election). A judge may not attend a victory party for a person who was elected unopposed to a local office; even if attendees might belong to more than one political party and the party is not for one particular group, the party would not appear to be a "purely social function" and the judge's attendance "could give the impression that the judge endorsed the friend's candidacy for public office." Opinion 12-03 (Election). However, a judge who is not up for re-election and whose adult child ran for judicial office may attend the adult child's post-election gathering after the polls

close and with no possibility of a runoff. A majority of the committee determined that attendance under these circumstances did not constitute a public endorsement for purposes of Canon 7. Opinion 14-16.

In Opinion 18-12 (Election), the committee stated that a judicial candidate may not provide campaign literature to partisan political group of volunteers for distribution to potential voters along with other partisan and nonpartisan candidates' flyers, as to do so would "undoubtedly give the impression that the judicial candidate is supporting the other candidates' races and partisan political affiliation – either of which is prohibited by the Canons."

13. May Judicial Candidate Respond to Personal Attacks on Own Record?

Canon 7A(3)(f) permits the candidate to respond to personal attacks or attacks on his or her record if the response does not violate Canon 7A(3)(e)(ii), which prohibits a candidate from knowingly misrepresenting the identity, qualifications, present position of, or any other fact concerning the candidate or an opponent. Canon 7A(3)(a) states that a judicial candidate "shall be faithful to the law and maintain professional competence in it, and shall not be swayed by partisan interests, public clamor, or fear of criticism."

14. May Judge Publicly Discuss His or Her Views on Disputed Legal or Political Issues?

Since 2006, Canon 7A(3)(e)(i) has provided that a judicial candidate must not "make pledges, promises, or commitments that are inconsistent with the impartial performance of the adjudicative duties of the office." This section is less restrictive than the former version, which prohibited a candidate from announcing his or her views on disputed legal or political issues. The commentary to Canon 7A(3)(e) states that a candidate should emphasize in any public statement his or her duty to uphold the law regardless of personal views. A judge may not indicate publicly his or her views on criteria used by a named U.S. President in nominating a Supreme Court justice. Opinion 10-14 (Election). A judge may attend a town hall meeting hosted by an elected state representative, which is for a limited purpose of discussing the outcome of a legislative session, but a judicial candidate may not attend functions sponsored by a community organizing project of the Democratic National Committee, unless such conduct complies with limited conditions prescribed by Canon 7C(3). Opinion 10-20 (Election). A judge may speak at gatherings of "Tea Party" organizations under limited conditions prescribed by Canon 7C(3). Opinion 10-19 (Election). A judicial candidate may not wear jewelry or apparel depicting an elephant or donkey if "a reasonable person objectively

viewing the jewelry or apparel would conclude that the judicial candidate is 'commenting on the candidate's affiliation with [a] political party' or is engaging in 'conduct that suggests or appears to suggest support of . . . a political party'" in violation of Canon 7C(3). Opinion 12-13 (Election).

The current language seems to take into account a judge's First Amendment speech rights and balance those against the need in society for a fair, impartial, and unbiased judiciary. The language is more narrowly tailored so that individual judges weigh the implications of their speech more on a case-by-case basis, always cognizant that, by virtue of their office, their free speech rights are not unbridled. They must be able to hear cases with an open mind and be clear in public statements so that the public does not fear that disputes have been prejudged without benefit of judicial process.

In 2008, the Florida Supreme Court added Canon 7A(3)(e)(iv), which prohibits judicial candidates from commending or criticizing jurors for their verdict, "other than in a court pleading, filing or hearing in which the candidate represents a party in the proceeding in which the verdict was rendered."

15. Will Attorney's Contribution to Judge's Campaign Require Recusal of Judge When Attorney Appears Before That Judge?

A contribution alone, without more, is not sufficient to require recusal. *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990).

16. May Judge Participate in Campaigns of Other Political Candidates?

The Commentary to Canon 7A(1)(b) states that a judge or judicial candidate is not prohibited from privately expressing his or her views on judicial candidates or other candidates for public office. *See also* § 105.071, Fla. Stat.; *In re DeFoor*, 494 So. 2d 1121 (Fla. 1986). However, Canon 7A(1)(b) says judges are to provide no public support or opposition. Opinions 00-15 and 98-25 illustrate this point. A judge whose spouse runs for public office may not attend a campaign gathering at the judge's home or other locations but may appear in a family photograph to be used in campaign. Opinion 07-13, Opinion 17-16. A judge may not publish in campaign materials a photograph showing the judge delivering an acceptance speech as justices of the Florida Supreme Court watch and listen. Opinion 10-18 (Election). If a supporter displays a judicial candidate's campaign sign on a vehicle on which another candidate's campaign sign is displayed, under Canon 7A(3)(c) the judge (1) must have the supporter remove the judicial candidate's sign if the supporter "serves at the pleasure of the candidate," (2) must discourage the

supporter from displaying that sign if "the supporter is an employee or official subject to the candidate's direction and control," and (3) should have the supporter remove the sign if the supporter falls into neither above category, to avoid the impression that the judicial candidate is running as part of a slate. Opinion 12-19 (Election).

When a judge's spouse publicly announces his or own candidacy for elected office, the judge's family may attend the announcement and be introduced at the announcement and campaign events, as long as the judge's position is not mentioned or featured at the announcement or campaign events. The judge's family members may attend future fundraising events for the spouse's campaign, if the judge's relationship to the spouse and the judge's position are not mentioned. The candidate spouse may explain the judge's absence by stating that the spouse's job or profession does not allow him or her to attend or endorse a candidate for office. Opinion 18-02.

Canon 7C(2) "authorize[s] judges facing active opposition in a merit retention election for the same judicial office to campaign together, including to pool campaign resources, in order to conduct a joint campaign designed to refute the allegations made in opposition to their continued judicial service, educate the public about merit retention, and express each judge's views as to why he or she should be retained in office," to the extent not otherwise prohibited by Florida law. *In re Amendments to Code of Judicial Conduct — Canon 7*, 167 So. 3d 399 (Fla. 2015)," to the extent not otherwise prohibited by Florida law.

17. To Whom Should Violations of Canon 7 Be Reported?

Allegations of campaign misconduct by judges and successful judicial candidates will fall under the jurisdiction of the Judicial Qualifications Commission. Alleged Canon 7 violations by unsuccessful candidates will be subject to attorney discipline.

18. May Judge Belong to Organization That Is Bipartisan in Membership and Nonpartisan in Nature and Addresses Political and Societal Issues?

A judge may belong to an organization that is bipartisan in membership and nonpartisan in nature and addresses political and societal issues. Opinion 95-01.

The organization at issue in that opinion was the Tiger Bay Club. In an earlier opinion, Opinion 92-28, the committee disallowed a judge's membership in the Tiger Bay Club because the club was a political organization, membership in

which was proscribed by Canon 7A. In revisiting the issue in Opinion 95-01, the committee found that Tiger Bay Clubs are "essentially public awareness organizations that address political and social issues," are bipartisan in membership, are nonpartisan in nature, and do not appear to be proscribed by Canon 7.

In Opinion 09-08, the committee advised that a judge who serves as president of a local Inn of Court may contact legislators on behalf of that organization to suggest passage or defeat of legislation relating to funding and duties of the judiciary.

A judge may not be a member in SUNPAC, a political action committee whose primary objectives are political (financing events for elected officials and contributing to the election of those officials). Opinion 13-20. The JEAC committee was evenly divided as to whether the judge could attend functions sponsored by SUNPAC. Half of the committee members believed attendance might be permissible if the event is not a political party function, the judge does not pay to attend, the judge's attendance could not be construed as a public endorsement of a candidate, and the judge does not actively engage in any political activity.

19. May Judge Serve as Officer in Local Bar Association?

A judge may not be an officer in a local bar association. Opinion 94-44. Citing Opinions 79-15 and 79-16, the committee stated that a judge's participation in a bar election and service as an officer could result in conflicts of interest and the appearance of impropriety that violate the code. However, the committee believed that a judge may ethically serve as an appointed chair of a local bar association committee. In Opinion 98-18, the committee also advised a judge that it is permissible to serve on the executive committee of a local bar association. In Opinion 10-03, the committee advised that a judge may serve as president of the local chapter of the American Board of Trial Advocates.

20. May Judge Discuss Appointment Process or Details of Opponent's Appointment?

A judicial candidate may educate the public about the judicial appointment process, as long as the candidate complies with Canon 7. A candidate may mention that the incumbent opponent was appointed, and when and by whom, but should be careful not to interject partisan politics into the discussion. Opinion 14-12 (Election).

21. What Are Some Examples of Canon 7 Violations?

The most serious violations, which can result in removal from office, include making explicit campaign promises that suggest how a judge will rule in particular kinds of cases and making unfounded attacks on an opponent. Also serious and likely to result in a reprimand are suggestions in sample ballots or campaign literature of partisan endorsements in a nonpartisan judicial race.

The following reported cases illustrate Canon 7 violations that have resulted in disciplinary action in Florida:

- ***In re Santino***, __ So. 3d __, 2018 WL 5095128 (Fla. 2018) (judge removed from office for campaign statements making inappropriate and false accusations against opponent, criminal defense attorney);

- ***In re DuPont***, 252 So. 3d 1130 (Fla. 2018) (judge removed from office for stating in forum that he would not find any statute unconstitutional because that would be "legislating from the bench," and for posting unverified and inaccurate information about opponent and his family);

- ***In re Shepard***, 217 So. 3d 71 (Fla. 2017) (public reprimand, 90-day suspension without pay, and payment of costs for judge for knowingly misrepresenting and "selectively editing" 1994 newspaper endorsement so it appeared she received 2014 endorsement for judicial campaign).

- ***In re Decker***, 212 So. 3d 291 (Fla. 2017) (six-month suspension without pay, public reprimand, and payment of costs for judge who falsely stated in campaign debate that he had never been accused of conflict of interest, and stated at judicial forum his affiliation with political party and support of political issue (judge was also charged with multiple violations of Rules of Professional Conduct as private attorney);

- ***In re Schwartz***, 174 So. 3d 987 (Fla. 2015) (court approved revised consent judgment imposing 30-day suspension without pay, $10,000 fine, and requirement to write letter of apology on judge who cursed at and threatened to sue store owner who displayed opponent's campaign sign but refused to display hers; judge also improperly removed official court documents from file);

- ***In re Griffin***, 167 So. 3d 450 (Fla. 2015) (court approved stipulation that judge receive public reprimand for opening campaign account and lending

money to her campaign before filing necessary qualification paperwork);

- ***In re Krause***, 166 So. 3d 176 (Fla. 2015) (court approved stipulation that judge receive 30-day suspension without pay for single incident of participating in her husband's judicial campaign by using social media to seek friends' assistance to help him "correct perceived misstatements of his judicial opponent");

- ***In re Krause***, 141 So. 3d 1197 (Fla. 2014) (judge was ordered to receive public reprimand and pay fine of $25,000 for committing several campaign violations, including using campaign funds to purchase table at Republican Party fund-raising event, which allowed her to speak for three minutes; failing to include "for" on campaign materials between her name and judicial office she sought; and accepting over $500 in campaign contributions from her husband);

- ***The Florida Bar v. Williams-Yulee***, 138 So. 3d 379 (Fla. 2014), *aff'd*, 138 S.Ct. 1656 (rejecting constitutional challenge to ban on judicial candidate's personal solicitation of campaign contributions; certiorari review pending).

- ***In re Turner***, 76 So. 3d 898 (Fla. 2011) (judge removed from office for violating campaign finance laws, engaging in practice of law, injecting himself into personal life of court employee, failing to act with order and decorum in proceeding before judge, and engaging in overall pattern of misconduct);

- ***In re Colodny***, 51 So. 3d 430 (Fla. 2010) (judge publicly reprimanded and fined for listing contributions to campaign fund as loans made by her, when funds were in fact loans from her father made in violation of statutory contribution limits);

- ***In re Dempsey***, 29 So. 3d 1030 (Fla. 2010) (judge publicly reprimanded for statements in campaign literature overstating years of legal experience and using term "re-elect" when judge previously had been appointed, not elected, to bench);

- ***In re Baker***, 22 So. 3d 538 (Fla. 2009) (judge publicly reprimanded and fined, with stipulation indicating that judge approved language in campaign mailer that could be interpreted as suggesting that opponent's contributors were trying to influence judicial decisions of opponent ("what are they trying to buy?"));

- ***In re Renke***, 933 So. 2d 482 (Fla. 2006) (judge removed from bench for misrepresenting during judicial campaign that he was running as incumbent judge, that he was chairman of water management district, that he had official support of city's firefighters, and that he had eight years of complex civil trial experience, and for campaign finance misconduct, including accepting from his father illegal campaign contributions disguised as earned income);

- ***In re Woodard***, 919 So. 2d 389 (Fla. 2006) (imposing reprimand and anger management counseling for number of violations, including three related to election activities: judge telephoned opponent's spouse and suggested opponent might wish to reconsider running against judge because it would affect judge's retirement and "therefore his grandchildren"; judge incorrectly stated number of jury trials over which he had presided; and judge had left arraignment session to attend radio interview for his campaign);

- ***In re Gooding***, 905 So. 2d 121 (Fla. 2005) (judge publicly reprimanded for campaign finance violations, including incurring campaign expenses when campaign lacked funds to cover expenses and lending to campaign substantial sums after campaign ended and after statutory deadline for depositing money into campaign account);

- ***In re Pando***, 903 So. 2d 902 (Fla. 2005) (judge publicly reprimanded and fined for campaign finance violations including accepting loans from family members in excess of $500 statutory limit, misrepresenting source of such loans in submitting and certifying campaign finance reports, and making misleading statements in JQC deposition regarding the source of $25,000 loan);

- ***In re Angel,*** 867 So. 2d 379 (Fla. 2004) (judge publicly reprimanded for engaging in pattern of improper conduct, namely participating in prohibited partisan political activity);

- ***In re Kinsey***, 842 So. 2d 77 (Fla. 2003) (judge publicly reprimanded and ordered to pay fine of $50,000, plus costs, for making improper campaign statements which implied she would favor one group of citizens over another or would make rulings based upon sway of popular sentiment in community);

- ***In re Rodriguez***, 829 So. 2d 857 (Fla. 2002) (judge publicly reprimanded and fined $40,000 for improper campaign finance activities and reporting

practices);

- ***In re McMillan***, 797 So. 2d 560 (Fla. 2001) (judge removed from bench for cumulative misconduct fundamentally inconsistent with responsibilities of judicial office, including campaign promises to favor state and police in court proceedings, as well as unfounded attacks on incumbent judge and local court system);

- ***In re Alley***, 699 So. 2d 1369 (Fla. 1997) (judge publicly reprimanded for conduct unbecoming candidate for judicial office, including misrepresenting qualifications, injecting party politics into nonpartisan race, and misrepresenting opponent's qualifications);

- ***In re Glickstein***, 620 So. 2d 1000 (Fla. 1993) (judge publicly reprimanded for endorsing, in letter written on office stationery and published in newspaper, retention of another judge);

- ***In re McGregor***, 614 So. 2d 1089 (Fla. 1993) (judge publicly reprimanded for actively campaigning for spouse in political campaign);

- ***In re Turner***, 573 So. 2d 1 (Fla. 1990) (judge publicly reprimanded for participation in son's campaign for judicial office);

- ***In re Berkowitz***, 522 So. 2d 843 (Fla. 1988) (removed judge from office for several code violations, including participation in mailing of sample ballots suggesting partisan endorsements of candidates in nonpartisan race);

- ***In re Kay***, 508 So. 2d 329 (Fla. 1987) (judge publicly reprimanded for mailing sample ballots suggesting partisan endorsement of candidates in nonpartisan race);

- ***In re Pratt***, 508 So. 2d 8 (Fla. 1987) (judge publicly reprimanded for financing and distributing sample ballots suggesting partisan endorsement in race for judicial office in which she was candidate);

- ***In re DeFoor***, 494 So. 2d 1121 (Fla. 1986) (judge publicly reprimanded for participation in two political campaigns, which included lobbying, organizing, and developing strategies on behalf of candidates);

- ***In re Lantz***, 402 So. 2d 1144 (Fla. 1981) (judge publicly reprimanded for directly soliciting election support from Bar member).

Appendix I

Florida Supreme Court Judicial Discipline Opinion Summaries

In re Kelly, 238 So. 2d 565 (Fla. 1970) (judge publicly reprimanded for ordering procedural changes outside of normal methods and advancing his own ambitions by criticizing fellow judges and court procedures during meetings he arranged with news media).

In re Dekle, 308 So. 2d 5 (Fla. 1975) (justice publicly reprimanded for using ex parte memorandum from attorney for one party in case before him in preparing judicial opinion).

In re Boyd, 308 So. 2d 13 (Fla. 1975) (justice publicly reprimanded for improperly receiving ex parte memorandum from attorney representing parties in case before court).

In re Lee, 336 So. 2d 1175 (Fla. 1976) (judge publicly reprimanded for public sexual conduct unbecoming member of judiciary).

In re LaMotte, 341 So. 2d 513 (Fla. 1977) (judge removed from bench for using state-issued credit card to pay for unauthorized personal travel expenses).

In re Taunton, 357 So. 2d 172 (Fla. 1978) (judge publicly reprimanded for knowingly placing himself in position whereby impartiality could be questioned through ex parte conferences with defendant and refusal to execute judgment against him, among other unethical actions on behalf of defendant).

In re Shearer, 377 So. 2d 970 (Fla. 1979) (proceedings against judge dismissed and reprimand recommendation rejected after court found that judge properly asserted Fifth Amendment rights when interrogated by police during investigation of accident causing property damage).

In re Crowell, 379 So. 2d 107, 110 (Fla. 1980) (judge removed from office after engaging in pattern of conduct over long period of time involving persistent abuse of contempt power).

In re Lantz, 402 So. 2d 1144 (Fla. 1981) (judge publicly reprimanded for repeated instances of arrogance and lack of courtesy in courtroom; creation of appearance of impropriety in asking law professor, who was litigant before him, to assist in law school admission of friend; adverse comments casting doubt on impartiality of

judiciary; direct solicitation of election support from bar member; refusal to release to counsel untranscribed notes of court reporter; ordering $10,700 attorney's fee for personal friend who had withdrawn from relevant case).

In re Gridley, 417 So. 2d 950 (Fla. 1982) (judge not disciplined for announcing strongly held religious beliefs against death penalty and writing series of letters to local newspaper; three dissenting members of court stated judge should have been disciplined because he had thrown his impartiality into question).

In re Turner, 421 So. 2d 1077 (Fla. 1982) (judge publicly reprimanded for ex parte communication with litigant, including inappropriate late-night visits to her home and shining flashlight into her bedroom window; arrogant, arbitrary, and capricious abuse of judicial powers in incarcerating attorneys accused of contempt without due process and in making public derogatory comments about attorneys in courtroom).

In re Leon, 440 So. 2d 1267 (Fla. 1983) (judge disciplined for engaging in improper ex parte conversations with another judge and state attorney regarding cases).

In re Speiser, 445 So. 2d 343 (Fla. 1984) (judge publicly reprimanded for advising employer defense attorneys, after judge's appointment to circuit bench but before taking office, as to "weak points" of state in prosecution of drug case and advising state attorney of "weak points" of defense case in similar drug-related cases).

In re Byrd, 460 So. 2d 377 (Fla. 1984) (judge publicly reprimanded for promoting, advertising, and conducting gambling with respect to golf tournament).

In re Muszynski, 471 So. 2d 1284 (Fla. 1985) (judge publicly reprimanded for ordering police officer to turn radio volume down or off while both were at restaurant; when police officer told judge that radio was as low as possible and regulations prohibited him from turning it off, judge, after identifying himself as circuit judge, "arrogantly castigated" officer. Later, judge sent officer letter directing him to appear at courthouse to explain alleged contemptuous conduct; letter stated failure to appear would constitute separate and independent contempt).

In re Tyler, 480 So. 2d 645 (Fla. 1985) (judge publicly reprimanded for violations of disciplinary rules as practicing attorney prior to election as county court judge, including failure to inform clients of election to bench and consequent inability to represent them).

In re Damron, 487 So. 2d 1 (Fla. 1986) (judge removed from office for engaging

in ex parte communications, acting in threatening manner towards parties and individuals, and soliciting political favor by promise of judicial acts).

In re DeFoor, 494 So. 2d 1121 (Fla. 1986) (judge publicly reprimanded for several incidents, including using office and authority to promote electronic device for personal gain).

In re Block, 496 So. 2d 133 (Fla. 1986) (judge publicly reprimanded for sharing fees with non-lawyer and placing bets with bookies in violation of Florida criminal statutes).

In re Clayton, 504 So. 2d 394 (Fla. 1987) (judge publicly reprimanded for ex parte determination of criminal cases).

In re Eastmoore, 504 So. 2d 756 (Fla. 1987) (judge publicly reprimanded for rude and overbearing behavior and improper wielding of judicial power in ordering news reporter to his chambers and failing to afford parent full opportunity to testify in child-custody matter).

In re Byrd, 511 So. 2d 958 (Fla. 1987) (judge publicly reprimanded for use of funds, while practicing as attorney and while on bench, for payment of personal debts and pledging of certificate of deposit held by trustee as collateral for personal loan).

In re Pratt, 508 So. 2d 8 (Fla. 1987) (judge publicly reprimanded for financing and distributing sample ballots suggesting partisan endorsement in race for judicial office in which she was candidate).

In re Kay, 508 So. 2d 329 (Fla. 1987) (judge publicly reprimanded for mailing sample ballots suggesting partisan endorsement of candidates in nonpartisan race).

In re Sturgis, 529 So. 2d 281 (Fla. 1988) (judge publicly reprimanded for, among other things, twice displaying handgun while presiding at hearings and using position as circuit judge to prevent inspection of official court records relevant to matters involving judge's misdeeds).

In re Berkowitz, 522 So. 2d 843 (Fla. 1988) (judge removed from bench for practicing law after assuming judicial office; committing trust account violations; failing to file accurate tax returns; and giving deceptive testimony on campaign irregularities).

In re Hayes, 541 So. 2d 105 (Fla. 1989) (judge publicly reprimanded for making

"gross unjudicial statements" to journalist about murder trial while trial was in progress).

In re Tye, 544 So. 2d 1024 (Fla. 1989) (judge publicly reprimanded for confronting, with pistol in hand, group of people he believed were participating in illegal drug transaction).

In re Capua, 561 So. 2d 574 (Fla. 1990) (judge publicly reprimanded for commingling funds; failing to properly prepare and give to clients statements accounting for monies received for them; and signing order to release son, charged in domestic disturbance, on his own recognizance without bond hearing).

In re Carnesoltas, 563 So. 2d 83 (Fla. 1990) (judge publicly reprimanded for, among other things, using judicial power to demean and ridicule attorney who had opposed judge in different case and, after having that attorney removed from courtroom, continuing to act as judge in matter to defendant's detriment).

In re Zack, 570 So. 2d 938 (Fla. 1990) (judge publicly reprimanded for use of profane language in reference to county sheriff before employee of sheriff's office).

In re Turner, 573 So. 2d 1 (Fla. 1990) (judge publicly reprimanded for participation in son's campaign for judicial office).

In re Trettis, 577 So. 2d 1312 (Fla. 1991) (judge publicly reprimanded for rude and overbearing behavior in court, including engaging in improper tirades and outbursts, engaging in verbal abuse and intimidation of courthouse personnel and other judges, failing to disqualify self in proceedings when impartiality might have been questioned, allowing personal relationships to influence judicial conduct, lending prestige of office in attempt to create employment position within judicial system for others; judge also agreed to undergo treatment to deal with stress).

In re Norris, 581 So. 2d 578 (Fla. 1991) (judge publicly reprimanded for three-day drinking binge, driving while intoxicated, discharging firearm in house, and attempting suicide).

In re Meyerson, 581 So. 2d 581 (Fla. 1991) (judge publicly reprimanded for failing to timely pay trust funds to clients' service providers when closing private practice; charging clients excessive fees; failing to comply with financial disclosure laws; and failing to obtain consent of clients to divide legal fees).

In re Perry, 586 So. 2d 1054 (Fla. 1991) (judge publicly reprimanded for, among

other things, verbally abusing and intimidating attorneys, witnesses, and parties).

In re Shenberg, 632 So. 2d 42 (Fla. 1991) (judge suspended without pay for corruptly requesting, soliciting, and agreeing to accept pecuniary benefit to influence performance of judicial duties).

In re Santora, 592 So. 2d 671 (Fla. 1992) (judge removed from chief judge position for public statements to newspaper affirmatively embracing and endorsing discriminatory racial stereotypes); 602 So. 2d 1269 (Fla. 1992) (judge publicly reprimanded for same conduct).

In re Carr, 593 So. 2d 1044 (Fla. 1992) (judge publicly reprimanded for using inappropriate language in open court and slurring nationality of witness).

In re Marko, 595 So. 2d 46 (Fla. 1992) (judge publicly reprimanded for rude, improper, and inappropriate remarks to party in dissolution of marriage hearing).

In re Fowler, 602 So. 2d 510 (Fla. 1992) (judge publicly reprimanded for conviction for furnishing false information about traffic accident to police officer).

In re Fleet, 610 So. 2d 1282 (Fla. 1992) (judge publicly reprimanded for displaying handgun, loading it, and questioning unruly and threatening defendant while on bench in open court).

In re Garrett, 613 So. 2d 463 (Fla. 1993) (judge removed from bench for knowingly shoplifting electronic item from store).

In re McGregor, 614 So. 2d 1089 (Fla. 1993) (judge publicly reprimanded for actively campaigning for spouse in spouse's campaign for county court clerk).

In re Glickstein, 620 So. 2d 1000 (Fla. 1993) (judge publicly reprimanded for endorsing, in letter written on office stationery and published in newspaper, retention of another judge).

In re Graham, 620 So. 2d 1273 (Fla. 1993), *cert. denied*, 510 U.S. 1163, 114 S.Ct. 1186, 127 L.Ed.2d 537 (1994) (judge removed from office for repeatedly using judicial position to make allegations against and improperly criticize fellow judges, elected officials, and others without reasonable factual basis or regard for their reputations; exceeding and abusing judicial power by imposing improper sentences and by improperly using contempt power; acting in undignified and discourteous manner toward individuals appearing in his court; acting in manner that impugned public perception of integrity and impartiality of judiciary; and closing public

proceedings).

In re Gloeckner, 626 So. 2d 188 (Fla. 1993) (judge publicly reprimanded for involvement in incident in which judge was charged with misdemeanor driving under the influence and careless driving).

In re Colby, 629 So. 2d 120 (Fla. 1993) (judge publicly reprimanded for convicting defendants without plea or trial when defendants failed to appear).

In re Vitale, 630 So. 2d 1065 (Fla. 1994) (judge publicly reprimanded for failure to vacate order that both parties agreed was mistakenly entered by judge).

In re Abel, 632 So. 2d 600 (Fla. 1994) (judge publicly reprimanded for sending on court stationery letter in which judge acted as character witness and reference on behalf of criminal defendant).

In re McIver, 638 So. 2d 45 (Fla. 1994) (judge publicly reprimanded for engaging in unlawful gambling in card games and for being found guilty of misdemeanor gambling charges related to those games).

In re Perry, 641 So. 2d 366 (Fla. 1994) (judge publicly reprimanded for unnecessarily abusing and berating recruiting officer for wearing army dress uniform to court and for exercising contempt powers in arbitrary and improper manner without regard for due process).

In re Stafford, 643 So. 2d 1067 (Fla. 1994) (judge publicly reprimanded for writing letter on official court stationery to federal probation officer as character witness and reference on behalf of convicted defendant).

In re Miller, 644 So. 2d 75 (Fla. 1994) (judge publicly reprimanded for writing letters to newspaper criticizing judicial system and for giving mother notice of child custody hearing after hearing had begun and forcing her to act as her own attorney in case in which judge lacked jurisdiction).

In re Davey, 645 So. 2d 398 (Fla. 1994) (judge publicly reprimanded for misrepresenting merits of case to former law partners and concealing negotiations, settlement, and fees).

In re Golden, 645 So. 2d 970 (Fla. 1994) (judge publicly reprimanded for making sexist and racial remarks; using crude, profane, and inappropriate language when presiding over legal proceedings; and failing to diligently perform duties of office).

In re McAllister, 646 So. 2d 173 (Fla. 1994) (judge removed from office for, among other things, "sexual harassment of a judicial assistant, a willingness to engage in ex parte communications and the intentional abuse directed toward the public defender's office").

In re Fogan, 646 So. 2d 191 (Fla. 1994) (judge sanctioned for writing character reference letter on official court stationery for personal friend facing sentencing in federal court; friend's federal probation officer had not requested letter).

In re Ward, 654 So. 2d 549 (Fla. 1995) (judge publicly reprimanded for writing character reference letter for criminal defendant recommending probation; letter was not response to official request by defendant's probation officer).

In re Esquiroz, 654 So. 2d 558 (Fla. 1995) (judge publicly reprimanded for incident leading to plea of nolo contendere for charge of driving under the influence).

In re Fletcher, 666 So. 2d 137 (Fla. 1995) (judge publicly reprimanded for incident of colliding with dock while operating boat and leaving scene of accident).

In re Johnson, 692 So. 2d 168 (Fla. 1997) (judge removed from office for repeatedly falsifying public records by backdating pleas accepted in DUI cases).

In re Wright, 694 So. 2d 734 (Fla. 1997) (judge publicly reprimanded for rude, abusive manner in addressing assistant state attorneys and crime victim during two separate incidents).

In re Graziano, 696 So. 2d 744 (Fla. 1997) (judge removed from office after hiring friend as guardian ad litem despite friend's lesser qualifications than other applicants; granting her raise despite poor performance evaluations; and using insulting or threatening language toward court employees).

In re Alley, 699 So. 2d 1369 (Fla. 1997) (judge publicly reprimanded for conduct unbecoming candidate for judicial office, including misrepresenting qualifications, injecting party politics into nonpartisan race, and misrepresenting opponent's qualifications).

In re Hapner, 718 So. 2d 785 (Fla. 1998) (judge who had resigned from bench was formally removed from office, effective as of date of her resignation, for actions while practicing law prior to election to county court (failure to communicate with clients; failure to document fee agreements; failure to meet deadlines; making misrepresentations to clients, appellate court, and Investigative

Panel of JQC; failure to pay Bar dues; and allowing operating and trust accounts to become overdrawn all) and for giving inaccurate and misleading testimony in domestic violence proceeding against former spouse; judge subsequently assessed JQC costs in 737 So. 2d 1075 (Fla. 1999)).

In re Wood, 720 So. 2d 506 (Fla. 1998) (judge publicly reprimanded for rude and intemperate behavior in courtroom).

In re Ford-Kaus, 730 So. 2d 269 (Fla. 1999) (judge removed from office for mishandling appeal, including intentionally inserting in brief false date for certificate of service and overbilling and lying to client, while in private practice prior to election to circuit bench).

In re Wilson, 750 So. 2d 631 (Fla. 1999) (judge publicly reprimanded for attempting to hinder law enforcement by asking restaurant employees not to identify her as witness to crime of theft of video surveillance camera and for lying to deputies about her knowledge of crime).

In re Frank, 753 So. 2d 1228 (Fla. 2000) (retired appellate judge publicly reprimanded for actions while on bench, including making false or misleading statements under oath concerning his involvement in divorce litigation of his daughter; not recusing himself from appeals based on his friendship with attorney in those appeals; improperly interfering with Bar grievance proceeding of that attorney; threatening to have son-in-law arrested or committed to psychiatric facility during divorce proceedings involving his other daughter).

In re Luzzo, 756 So. 2d 76 (Fla. 2000) (judge publicly reprimanded for accepting free tickets to baseball games from law firm whose lawyers appeared before him).

In re Newton, 758 So. 2d 107 (Fla. 2000) (judge publicly reprimanded for pattern of abusive, demeaning, and sarcastic comments to litigants, witnesses, and attorneys).

In re Schwartz, 755 So. 2d 110 (Fla. 2000) (judge publicly reprimanded for continually making rude and sarcastic remarks to counsel during oral arguments; in addition to reprimand, judge required to offer written apology, enter counseling for stress management, and video and audiotape future oral argument panels).

In re Shea, 759 So. 2d 631 (Fla. 2000) (judge removed from office for threatening to recuse himself from all of attorney's cases unless attorney agreed to withdraw from representing client with whom judge had legal dispute; repeated instances of hostile behavior toward attorneys, court personnel, and other judges also

contributed to removal from the bench).

In re Richardson, 760 So. 2d 932 (Fla. 2000) (judge publicly reprimanded for trying to influence police officers who arrested him by announcing he was judge, wanting to speak to chief of police, and stating he was "pro police"; underlying charge for which judge was arrested was ultimately dismissed, but attempt to avoid arrest was found serious enough to merit discipline).

In re Haymans, 767 So. 2d 1173 (Fla. 2000) (judge publicly reprimanded for engaging in pattern of rudeness and disrespect toward lawyers, parties, witnesses, victims, and court personnel).

In re McMillan, 797 So. 2d 560 (Fla. 2001) (judge removed from bench for cumulative misconduct fundamentally inconsistent with responsibilities of judicial office, including campaign promises to favor state and police in court proceedings, as well as unfounded attacks on incumbent judge and local court system).

In re Baker, 813 So. 2d 36 (Fla. 2002) (judge admonished for soliciting communications from computer experts concerning technical issues related to issues of damages in case before him without involvement of litigants or their attorneys).

In re Rodriguez, 829 So. 2d 857 (Fla. 2002) (judge publicly reprimanded and fined $40,000 for improper campaign finance activities and reporting practices).

In re Holloway, 832 So. 2d 716 (Fla. 2002) (while serving as witness in friend's child custody hearing, judge had ex parte meeting with presiding judge in case, questioned that judge's impartiality by making crude remarks, contacted police during investigation, and lied under oath; judge also used judicial position to have brother's case heard earlier). (Note: this judge resigned from bench before Florida Supreme Court took final action.)

In re Kinsey, 842 So. 2d 77 (Fla. 2003) (judge publicly reprimanded and ordered to pay fine of $50,000, plus costs, for making improper campaign statements that implied she would favor one group of citizens over another or would make rulings based upon sway of popular sentiment in community).

In re Schapiro, 845 So. 2d 170 (Fla. 2003) (judge publicly reprimanded for engaging in pattern of inappropriately chastising, berating, and embarrassing lawyers appearing before him).

In re Cope, 848 So. 2d 301 (Fla. 2003) (judge publicly reprimanded for being

publicly intoxicated while attending judicial conference in California; engaging in inappropriate conduct of intimate nature with intoxicated woman during same judicial conference).

In re Angel, 867 So. 2d 379 (Fla. 2004) (judge publicly reprimanded for engaging in pattern of improper conduct, namely participating in prohibited partisan political activity).

In re Andrews, 875 So. 2d 441 (Fla. 2004) (judge publicly reprimanded for making inappropriate comments to news media about defendant in case before him).

In re Pando, 903 So. 2d 902 (Fla. 2005) (judge publicly reprimanded and fined for campaign finance violations including accepting loans from family members in excess of $500 statutory limit, misrepresenting source of such loans in submitting and certifying campaign finance reports, and making misleading statements in JQC deposition regarding source of $25,000 loan).

In re Gooding, 905 So. 2d 121 (Fla. 2005) (judge publicly reprimanded for campaign finance violations, including incurring campaign expenses when campaign lacked funds to cover expenses and lending to campaign substantial sums after campaign ended and after statutory deadline for depositing money into campaign account).

In re Allawas, 906 So. 2d 1052 (Fla. 2005) (judge publicly reprimanded for not expeditiously issuing rulings in dozen cases, which conduct adversely impacted administration of justice).

In re Diaz, 908 So. 2d 334 (Fla. 2005) (judge publicly reprimanded, suspended, and fined for sending anonymous email to judge referring to another judge who reported illegal immigrants to federal authorities when he became aware of their status during hearings and containing comment recipient interpreted as implied threat of retaliation by Hispanic voters).

In re Henson, 913 So. 2d 579 (Fla. 2005) (judge removed from office for practicing law while still judge and, acting as attorney between terms of judicial service, advising client in criminal matter to flee country rather than face prosecution).

In re Maloney, 916 So. 2d 786 (Fla. 2005) (judge publicly reprimanded for directing police to release immediately from custody family friend who had been arrested for driving under influence of alcohol).

In re Woodard, 919 So. 2d 389 (Fla. 2006) (judge publicly reprimanded and ordered to anger management counseling for leaving arraignment to conduct re-election campaign interview; asserting in campaign literature inaccurate level of experience; arriving late to scheduled hearings; beginning hearings prior to scheduled start time without presence of party's attorney; issuing bench warrant leading to incarceration of expert witness without considering extenuating circumstances caused by hurricanes; acting rudely toward counsel, witnesses, and parties).

In re Adams, 932 So. 2d 1025 (Fla. 2006) (judge publicly reprimanded for engaging in romantic relationship with attorney who appeared before him and for whom he granted continuance and dismissed charges).

In re Renke, 933 So. 2d 482 (Fla. 2006) (judge removed from bench for misrepresenting during judicial campaign that he was running as incumbent judge, that he was chairman of water management district, that he had official support of city's firefighters, and that he had eight years of complex civil trial experience, and for campaign finance misconduct, including accepting from his father illegal campaign contributions disguised as earned income).

In re Downey, 937 So. 2d 643 (Fla. 2006) (judge publicly reprimanded and required to retire at end of term for habitual viewing of pornography from courthouse computer; failing to disclose juror-written communication; instigating improper contact and communication with female attorneys).

In re Albritton, 940 So. 2d 1083 (Fla. 2006) (judge publicly reprimanded, suspended, and fined for pattern of improper conduct, including using judicial position to pressure attorneys to expend personal monies for his entertainment; making rude comments to attorneys and litigants; requiring church attendance as condition of probation).

In re Sloop, 946 So. 2d 1046 (Fla. 2006) (judge removed from office for failing to halt unjustified arrest and incarceration of traffic defendants waiting properly within adjoining courtroom; repeatedly displaying abusive and insulting behavior toward litigants).

In re Maxwell, 994 So. 2d 974 (Fla. 2008) (judge publicly reprimanded for ordering release of sister of former colleague despite the facts that arrestee had no first appearance and was serving sentence of five years' probation for obtaining controlled substances by fraud, thus making her ineligible for pretrial release program).

In re Aleman, 995 So. 2d 395 (Fla. 2008) (judge publicly reprimanded for unreasonably forcing attorney to prepare handwritten motion for judge's disqualification within short time period, which was found to be improper in context of first-degree murder case in which death penalty was being sought).

In re Allen, 998 So. 2d 557 (Fla. 2008) (judge publicly reprimanded for personally attacking fellow judge in appellate court concurring opinion).

In re Barnes, 2 So. 3d 166 (Fla. 2009) (judge publicly reprimanded for inappropriately filing petition for writ of mandamus seeking to compel fellow judges "to provide for a meaningful First Appearance Hearing for all citizens accused of a crime who cannot immediately make bond").

In re Henderson, 22 So. 3d 58 (Fla. 2009) (judge publicly reprimanded for acting as friend and mentor to convicted felon, including acting as proponent in felon's leasing apartment, when felon was criminal defendant in judge's court).

In re Baker, 22 So. 3d 538 (Fla. 2009) (judge publicly reprimanded and fined, with stipulation indicating that judge approved language in campaign mailer that could be interpreted as suggesting that opponent's contributors were trying to influence judicial decisions of opponent ("what are they trying to buy?")).

In re Bell, 23 So. 3d 81 (Fla. 2009) (judge publicly reprimanded for ordering arrest of woman as putative primary aggressor, without complaint from former husband or law enforcement officials, when former husband, with whom judge previously had interacted in professional settings, and woman, whom judge and his family knew from social interactions, appeared before judge for determination whether probable cause existed to charge former husband with domestic battery against her).

In re Dempsey, 29 So. 3d 1030 (Fla. 2010) (judge publicly reprimanded for statements in campaign literature overstating years of legal experience and using term "re-elect" when judge previously had been appointed, not elected, to bench).

In re Eriksson, 36 So. 3d 588 (Fla. 2010) (judge publicly reprimanded for revoking bond for defendant who sought recusal, thereby punishing defendant for exercising legitimate legal right, and for employing unduly rigid process in dealing with self-represented litigants, so as to impede their ability to obtain relief and protection they sought from court).

In re Colodny, 51 So. 3d 430 (Fla. 2010) (judge publicly reprimanded and fined for listing contributions to campaign fund as loans made by her, when funds were

in fact loans from her father made in violation of statutory contribution limits).

In re Turner, 76 So. 3d 898 (Fla. 2011) (judge removed from office for violating campaign finance laws, engaging in practice of law, injecting himself into personal life of court employee, failing to act with order and decorum in proceeding before judge, and engaging in overall pattern of misconduct).

In re Singbush, 93 So. 3d 188 (Fla. 2012) (judge publicly reprimanded, ordered to submit to Judicial Qualifications Commission ("JQC") signed letter of apology to public, fellow judges, and legal community, and to submit written weekly logs to special counsel of JQC documenting timeliness of court proceedings for violating Code of Judicial Conduct by being habitually late for court, offering to resume hearings at inconvenient times, taking multiple lengthy smoke breaks, which compromised parties' ability to have their cases heard promptly, routinely failing to appear on time at first appearances, taking long lunch breaks when scheduled for first appearance duties, and having previously responded to allegations of tardiness in response to 6(b) notice of investigation).

In re Nelson, 95 So. 3d 122 (Fla. 2012) (judge publicly reprimanded for DUI).

In re Shea, 110 So. 3d 414 (Fla. 2013) (judge publicly reprimanded for pattern of rude and intemperate behavior and required to write letters of apology and continue mental health treatment; sanctions would likely have been more severe but for judge's self-initiated participation in anger management therapy and request for guidance from other judges).

In re Barry Michael Cohen, 134 So. 3d 448 (Fla. 2014) (judge was ordered to receive public reprimand for making inappropriate comments, including public statement made about pending case and public involvement in partisan political campaign).

The Florida Bar v. Williams-Yulee, 138 So. 3d 379 (Fla. 2014), *aff'd*, 138 S.Ct. 1656 (rejecting constitutional challenge to ban on judicial candidate's personal solicitation of campaign contributions; certiorari review pending).

In re Sheehan, 139 So. 3d 290, 292 (Fla. 2014) (public reprimand was ordered for judge who pleaded guilty to DUI; supreme court stated that her conduct was reprehensible: "Such disregard of criminal law and public safety undermines the public's confidence in the integrity of the judiciary and will not be tolerated").

In re Krause, 141 So. 3d 1197 (Fla. 2014) (judge was ordered to receive public reprimand and pay fine of $25,000 for committing several campaign violations,

including using campaign funds to purchase table at Republican Party fund-raising event, which allowed her to speak for three minutes; failing to include "for" on campaign materials between her name and judicial office she sought; and accepting over $500 in campaign contributions from her husband).

In re Kautz, 149 So. 3d 681 (Fla. 2014) (public reprimand was ordered for judge who appeared on behalf of sister at sister's first appearance; at times demeaned individuals who appeared before her in injunction, juvenile, and dependency cases; and "failed to appreciate the input from the other stakeholders in the court system to the extent that she on occasion ruled in a way that made it appear she either did not know the law or refused to apply it").

In re Flood, 151 So. 3d 1097 (Fla. 2014) (public reprimand was ordered for judge who had "inappropriate relationship with her bailiff, over whom she exercised supervisory authority").

In re Hawkins, 151 So. 3d 1200 (Fla. 2014) (judge was removed from office for regularly using court resources for her ministries business at work, "failing to maintain and enforce high standards of conduct and personally observe those standards by her failure to pay state sales tax on the sale of her business products and failure to register the name of her business under the fictitious name law," linking sale of her business products to judicial office by appearing on her business website in judicial robes, lacking candor during disciplinary investigation, and "obfuscation and frustration of proper discovery").

In re Recksiedler, 161 So. 3d 398 (2015) (public reprimand was ordered for judge who failed to disclose, and then provided incorrect information about, her driving record).

In re Krause, 166 So. 3d 176 (Fla. 2015) (court approved stipulation that judge receive 30-day suspension without pay for single incident of participating in her husband's judicial campaign by using social media to seek friends' assistance to help him "correct perceived misstatements of his judicial opponent").

In re Griffin, 167 So. 3d 450 (Fla. 2015) (court approved stipulation that judge receive public reprimand for opening campaign account and lending money to her campaign before filing necessary qualification paperwork).

In re Watson, 174 So. 3d 364 (Fla. 2015) (judge removed from bench because of "pattern of deceit and deception" in case she was involved in while in private practice).

In re Schwartz, 174 So. 3d 987 (Fla. 2015) (court approved revised consent judgment imposing 30-day suspension without pay, $10,000 fine, and requirement to write letter of apology on judge who cursed at and threatened to sue store owner who displayed opponent's campaign sign but refused to display hers; judge also improperly removed official court documents from file).

In re Murphy, 181 So. 3d 1169 (Fla. 2016) (court found unfit for office and removed judge who used profanity in open courtroom, threatened public defender with violence and had physical confrontation with him, and then resumed docket with defendants whose attorneys were not present).

In re Collins, 195 So. 3d 1129 (Fla. 2016) (court approved revised consent judgment imposing public reprimand, completion of anger management course, and attendance at domestic violence course for judge who berated and belittled victim of domestic violence for failing to respond to subpoena to testify against her abuser, father of her child; during contempt proceedings, judge was "discourteous and impatient toward the distraught victim," raising her voice, being sarcastic, speaking harshly, and interrupting victim, and sentenced her to spend three days in jail).

In re Holder, 195 So. 3d 1133 (Fla. 2016) (court approved stipulated discipline of public reprimand and completion of six additional CJE hours on ethics for judge who, intending to help defendant who was Army Green Beret over whose case he was presiding, engaged in inappropriate ex parte communication with state attorney and made public offer to convert defendant's remaining community control to probation before conducting hearing on that matter).

In re Contini, 205 So. 3d 1281 (Fla. 2016) (court ordered public reprimand, letter of apology, judicial mentoring for three years, completion of stress management program, and assessment of costs for judge "(1) sending an *ex parte* e-mail to the Broward Public Defenders Office; (2) failing to seek a recusal or transfer when an appeal effectively froze his division; and (3) making impertinent and belittling remarks in open court about a pending matter").

In re Decker, 212 So. 3d 291 (Fla. 2017) (six-month suspension without pay, public reprimand, and payment of costs for judge charged with multiple violations of Rules of Professional Conduct as private attorney, including failure to disclose he was representing judge in other litigation, failing to advise clients of implications of common representation, and lack of candor to tribunal; judge was further found to have falsely stated in campaign debate that he had never been accused of conflict of interest, and stated at judicial forum his affiliation with

political party and support of political issue).

In re Shepard, 217 So. 3d 71 (Fla. 2017) (public reprimand, 90-day suspension without pay, and payment of costs for judge for knowingly misrepresenting and "selectively editing" 1994 newspaper endorsement so it appeared she received 2014 endorsement for judicial campaign).

In re Yacucci, 228 So. 3d 523 (Fla. 2017), a judge was suspended for 30 days without pay and ordered to complete a judicial ethics course and pay JQC costs, based on an acrimonious relationship between the judge and an attorney "marked by lawsuits, a public altercation and televised disparagement, the jailing of [the attorney] for contempt, judicial campaign disputes, unsolicited attempts to influence a petition for writ of prohibition, and multiple refusals to disqualify himself."

In re DuPont, 252 So. 3d 1130 (Fla. 2018) (judge removed from office for stating in forum that he would not find any statute unconstitutional because that would be "legislating from the bench," and for posting unverified and inaccurate information about opponent and his family).

In re Santino, __ So. 3d __, 2018 WL 5095128 (Fla. 2018) (judge removed from office for campaign statements making inappropriate and false accusations against opponent, criminal defense attorney).

In re White-Labora, __ So. 3d __, 2018 WL 5994087 (Fla. 2018) (court approved stipulated discipline of public reprimand for judge who improperly provided character reference letter, on her official court stationery, on behalf of criminal defendant awaiting sentencing in federal court).

Appendix II

Overview of Canons, Florida Code of Judicial Conduct

Introduction And Caveat

This summary serves as a reference guide to the various parts of the Florida Code of Judicial Conduct (the "code") but should not be viewed as a substitute for reading the code. If a code provision in the summary appears relevant to an issue in which the judge or judicial candidate is interested, the judge or judicial candidate should read the entire code provision and the commentary that follows. In addition, when one code provision appears to permit certain judicial conduct, other code provisions should be consulted to ensure that the conduct in question is not prohibited elsewhere.

Definitions

The Florida Supreme Court added a "definitions" section in the January 1, 1995, revision to the code. Some of the words and phrases defined in this new section are "candidate," "economic interest," "member of the judge's family," and "political organization." The text of the canons does not indicate which words or phrases are contained in the definitions section, so it is important to refer regularly to that section for guidance and additional information.

Specific Canons

1. Canon 1: A Judge Shall Uphold the Integrity and Independence of the Judiciary

Canon 1 is a general provision that exhorts judges to uphold the integrity and independence of the judiciary by following high standards of conduct. This canon sets the tone for the entire Code of Judicial Conduct, but the only specific requirement is found in the commentary, which states that judges "must comply with the law, including the provisions of this code." Therefore, as a general provision, Canon 1 is unlikely to be cited alone as a provision that was violated by a judge. Rather, when a judge violates other canons, which contain specific proscriptions that are usually the basis of guidance and discipline, Canon 1 is relevant because any code violation is likely to damage the perception that the judiciary is "independent and honorable."

2. Canon 2: A Judge Shall Avoid Impropriety and the Appearance of Impropriety in All of the Judge's Activities

Canon 2 provides that a judge must avoid impropriety and the appearance of impropriety by:

a. respecting and complying with the law;

b. not allowing relationships to influence the judge's judicial behavior, not lending the prestige of judicial office to advance private interests, not giving the appearance that others are in the position to influence the judge, and not testifying voluntarily as a character witness; and

c. not holding membership in an organization that practices invidious discrimination.

Canon 2 is broad in its application to a judge's conduct. To avoid impropriety and the appearance of impropriety, a judge "shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary." Canon 2A. The commentary to Canon 2A specifically states that "[t]he prohibition against behaving with impropriety or the appearance of impropriety applies to both the professional and personal conduct of a judge."

While Canon 2A is a broad description of the conduct expected of judges, Canons 2B and 2C are more specific. Canon 2B regulates when a judge can write letters of recommendation because, by doing so, a judge is advancing the private interests of another. In addition, Canon 2B prohibits a judge from testifying voluntarily as a character witness because such testimony could lend the prestige of the judicial office to the party for whom the judge testifies.

Canon 2C, which prohibits a judge from holding membership in an organization that practices invidious discrimination, was added to the January 1, 1995, revised code. The commentary to Canon 2C states that "[m]embership of a judge in an organization that practices invidious discrimination gives rise to perceptions that the judge's impartiality is impaired."

3. Canon 3: A Judge Shall Perform the Duties of Judicial Office Impartially and Diligently

a. In General

Canon 3A reiterates the theme in Canons 1 and 2 that a person becoming a judge

must accept the fact that a judge's first responsibility is to the law, the Code of Judicial Conduct, and the duties that a judge must carry out. Canon 3A states, "The judicial duties of a judge take precedence over all the judge's other activities." The remainder of Canon 3 sets out the obligations that a judge has with respect to the various judicial duties that come with the position.

b. Adjudicative Responsibilities

Canon 3B provides that a judge must hear and decide matters assigned to the judge, must be faithful to and competent in the law, and must not be influenced by outside factors. In addition, a judge must keep order and decorum in all proceedings and be patient, dignified, and courteous to individuals he or she meets in an official capacity.

Paragraphs (5) and (6) of Canon 3B were added to the code as part of the January 1, 1995, revision. Under these two paragraphs, a judge must "perform judicial duties without bias or prejudice" and "require lawyers in proceedings before the judge to refrain from manifesting . . . bias or prejudice" against any persons in a proceeding.

Paragraph (7) of Canon 3B also contains new provisions. In addition to the former language providing that a judge must accord every person with a legal interest in a proceeding the opportunity to be heard, paragraph (7) now sets forth new rules regarding ex parte communications. Generally, "[a] judge shall not initiate, permit, or consider ex parte communications," but some ex parte communications are permitted "for scheduling, administrative purposes, or emergencies that do not deal with substantive matters." To engage in ex parte communication, however, the judge must believe that no party will gain an advantage as a result of the communication, and the judge must be sure that all parties are notified of the substance of the communication. A judge also may participate in ex parte communications in other limited circumstances, such as when the parties agree that the judge may confer separately with the parties and their lawyers for the purpose of mediating or settling a case.

Also included in Canon 3B's list of required and prohibited conduct is that a judge must "dispose of all judicial matters promptly, efficiently, and fairly." Canon 3B prohibits a judge from commending or criticizing jurors for their verdict but allows a judge to thank a jury for service; Canon 3B prohibits a judge from disclosing or using for nonjudicial purposes any nonpublic information that the judge acquires in his or her judicial capacity.

In another revision to the code, paragraph (9) of Canon 3B sets less restrictive limits on the public comments that a judge may make regarding cases. "A judge shall not, while a proceeding is pending or impending in any court, make any public comment that might reasonably be expected to affect its outcome or impair its fairness or make any nonpublic comment that might substantially interfere with a fair trial or hearing." Paragraph (10) of Canon 3B prohibits a judge from making "pledges, promises, or commitments that are inconsistent with the impartial performance of the adjudicative duties of the office" regarding "parties or classes of parties, cases, controversies, or issues likely to come before the court."

c. Administrative Responsibilities

As with the adjudicative responsibilities detailed in Canon 3B, Canon 3C requires that a judge discharge administrative responsibilities diligently, without bias or prejudice, and in a competent manner. The judge must require those under his or her authority to carry out their administrative duties in the same diligent manner that is required of the judge and also to refrain from manifesting bias or prejudice in their official duties. A 1995 addition to the code is that "[a] judge shall not make unnecessary appointments." Fla. Code Jud. Conduct, Canon 3C(4). Also, appointments must be made impartially and on the basis of merit, and a judge must avoid nepotism and favoritism.

d. Disciplinary Responsibilities

Under the disciplinary provisions, which were new to the 1995 version of the code, a judge must take appropriate action when he or she has information or actual knowledge indicating that another judge has violated the Code of Judicial Conduct or that a lawyer has violated the Rules Regulating The Florida Bar. The Florida Supreme Court issued an opinion clarifying the meaning of "appropriate action," indicating that it may include directly communicating with the judge or lawyer who has committed the violation, taking other direct action if available, and reporting the violation to the appropriate authority or agency. *In re Code of Judicial Conduct*, 656 So. 2d 926 (Fla. 1995).

e. Disqualification

Canon 3E instructs a judge regarding when disqualification is necessary on ethical grounds. Generally, "[a] judge shall disqualify himself or herself in a proceeding in which the judge's impartiality might reasonably be questioned." Fla. Code Jud. Conduct, Canon 3E(1). Such instances include, but are not limited to, when the judge has a personal bias or prejudice toward a party or attorney or has personal

knowledge of disputed evidentiary facts, when the judge previously served as a lawyer in the controversy, when the judge or a member of the judge's family has an economic interest in the proceeding that is more than de minimis, when the judge has a relative who is involved in the case, or when the judge has made a public statement that commits, or appears to commit, the judge as to parties, issues, or controversies in a proceeding.

f. Remittal of Disqualification

Canon 3F provides that a judge who is disqualified under Canon 3E may continue to preside in the case if the parties and the lawyers agree, out of the presence of the judge, to waive disqualification.

4. Canon 4: A Judge Is Encouraged to Engage in Activities to Improve the Law, the Legal System, and the Administration of Justice

Canon 4 addresses a judge's quasi-judicial activities, while Canon 5 addresses extrajudicial activities. Quasi-judicial activities refer to activities that are not directly related to a judge's work as a judge but are related to the law, the legal system, and the administration of justice. Extrajudicial activities regulated under Canon 5 refer to activities not associated with the judge's official duties.

Both Canon 4 and Canon 5 contain subparagraph A, which is part of the 1995 code revision and 2008 amendments. Canons 4A and 5A provide a framework for deciding which quasi-judicial and extrajudicial activities are appropriate. Such activities must not '(1) cast reasonable doubt on the judge's capacity to act impartially as a judge; (2) undermine the judge's independence, integrity, or impartiality; (3) demean the judicial office; (4) interfere with the proper performance of judicial duties; (5) lead to frequent disqualification of the judge; or (6) appear to a reasonable person to be coercive.'

As long as a judge does not violate the general prohibitions under Canon 4A, he or she is encouraged to "speak, write, lecture, teach and participate in other quasi-judicial activities concerning the law, the legal system, the administration of justice, and the role of the judiciary as an independent branch within our system of government." Fla. Code Jud. Conduct, Canon 4B. The commentary to Canon 4B notes that judges are uniquely qualified to participate in improving the law, the legal system, and the administration of justice, including, but not limited to, "the improvement of the role of the judiciary as an independent branch of government, the revision of substantive and procedural law, the improvement of criminal and juvenile justice, and the improvement of justice in the areas of civil, criminal,

family, domestic violence, juvenile delinquency, juvenile dependency, probate, and motor vehicle law." The commentary to Canon 4B also states that judges' support of pro bono legal services is an activity that relates to improvement of the administration of justice. As with other code provisions, however, judges are reminded in Canon 4B that the permission to participate in these activities is "subject to the requirements of this Code." In other words, a judge cannot engage in the conduct permitted under Canon 4 if doing so would violate any other provision of the code.

Canon 4C indicates that a judge may appear at a public hearing or may otherwise consult with the executive or legislative branches of government only on matters concerning the law, the legal system, or the administration of justice, or when the judge is acting pro se in a matter regarding the judge or his or her own interests.

Canon 4D provides that "[a] judge is encouraged to serve as a member, officer, director, trustee or non-legal advisor of an organization or governmental entity devoted to the improvement of the law, the legal system, the judicial branch, or the administration of justice," subject to a number of restrictions. For example, the judge may not serve such an organization in an official capacity if the organization is likely to be involved in legal proceedings that ordinarily would come before the judge. A judge also would have to decline to serve if the organization is likely to be involved frequently in adversary proceedings in the judge's court or in a court over which the judge's court has appellate jurisdiction.

Judges may assist such organizations in planning fund-raising and in managing and investing the organization's funds but are not permitted to solicit funds for the organization personally or directly. The 1995 revision to the code added language permitting judges to solicit funds from other judges "over whom the judge does not exercise supervisory or appellate authority." Canon 4D(2)(a). In addition, a judge shall not personally or directly solicit membership in such an organization if the solicitation might reasonably be perceived as coercive. Canon 4D(2)(d). In the 2008 amendments to the code, the Florida Supreme Court added language to Canon 4D stating that a judge may appear or speak at, and even be featured on the program of a fund-raising event but only "if the event concerns the law, the legal system, or the administration of justice and the funds raised will be used for a law-related purpose(s)." Fla. Code Jud. Conduct, Canon 4D(2)(b). The 2008 amendments also allow a judge to use court premises, staff, stationery, equipment, or other resources for fund-raising purposes but only "for incidental use for activities that concern the law, legal system, or the administration of justice, subject to the requirements of this Code." Fla. Code Jud. Conduct, Canon 4D(2)(e).

5. Canon 5: A Judge Shall Regulate Extrajudicial Activities to Minimize the Risk of Conflict with Judicial Duties

Canon 5 permits judges to participate in a wide range of extrajudicial activities, including speaking, writing, lecturing, and teaching concerning non-legal subjects. As with Canon 4, however, judges must abide by restrictions on these activities. All of the restrictions on a judge's activities in educational, religious, charitable, fraternal, sororal, or civic organizations are the same as the restrictions on quasi-judicial conduct regulated by Canon 4, with one addition. Canon 5C(2) adds that a judge is prohibited from accepting an appointment to a governmental committee or position that is concerned with matters other than the improvement of the law, the legal system, the judicial branch, or the administration of justice.

The remainder of Canon 5 addresses Financial Activities (5D), Fiduciary Activities (5E), Service as Arbitrator or Mediator (5F), and Practice of Law (5G). Canon 5D prohibits judges from engaging in financial and business dealings that would appear to exploit the judge's judicial position or involve the judge in ongoing business relationships with lawyers or other persons likely to come before the judge's court. Judges may, however, engage in a limited range of extrajudicial financial activities. Judges may hold and manage investments owned by the judge and members of the judge's family, and a judge may manage and participate in any business that is closely held by the judge or the judge's family or in a business that is engaged primarily in investing the judge's or the judge's family's financial resources. Otherwise, a judge is prohibited from engaging in such business ventures. Canon 5D also requires that judges minimize the number of cases in which financial interests would cause them to be disqualified.

Under Canon 5D(5), judges may accept gifts, bequests, favors, or loans only in limited circumstances. For example, a judge may accept a gift incident to a public testimonial, resource materials supplied by publishers for official use, invitations to bar-related functions, a gift, award, or benefit incident to the business of the judge's spouse, or a loan from a lending institution on the same terms available to the general public. Judges also may accept any other gift, bequest, favor, or loan if (1) the donor is not a party or someone who is likely to come before the judge's court or to have his or her interests come before the judge's court, and (2) when its value or the aggregate value in a calendar year of such gifts, bequests, favors, or loans from a single source exceeds $100, the judge reports it in the same manner as it would be reported under Canon 6B(2).

The provisions under Canon 5 should be read together with the provisions of Canon 6, which regulates fiscal matters of a judge. Canon 6 addresses all of a

judge's fiscal matters, including those related to judicial and extrajudicial conduct.

Canon 5E provides that a judge shall not serve as a fiduciary except for a member of the judge's family, and then only if doing so would not interfere with the judge's judicial duties.

Canon 5F prohibits a judge from acting as an arbitrator or mediator (although senior judges may serve as mediators (and, effective October 1, 2016, as arbitrators, or voluntary trial resolution judges) in cases outside the circuit in which they are presiding as a judge), while Canon 5G prohibits a judge from practicing law, except that a judge may act pro se and give legal advice to a member of the judge's family without compensation. (In Opinion 95-33, the committee advised that a retired judge subject to recall could serve as a hearing officer for a city because, under the application section of the code, such judges are expressly exempted from Canons 5C(2), 5E, 5F, and 6A.)

6. Canon 6: Fiscal Matters of a Judge Shall Be Conducted in a Manner That Does Not Give the Appearance of Influence or Impropriety; a Judge Shall Regularly File Public Reports As Required by Article II, Section 8, of the Constitution of Florida, and Shall Publicly Report Gifts, Expense Reimbursements and Payments, and Waivers of Fees or Charges; Additional Financial Information Shall Be Filed with the Judicial Qualifications Commission to Ensure Full Financial Disclosure

Canon 6 addresses both compensation for quasi-judicial and extrajudicial services and financial reporting. Under Canon 6A, judges may receive compensation and reimbursement of expenses for the quasi-judicial and extrajudicial activities described in Canons 4 and 5. There are, however, restrictions on compensation and expense reimbursement. The compensation must not exceed a reasonable amount or an amount that a non-judge would receive, and expense reimbursements must be limited to actual costs incurred by the judge and, when appropriate, the judge's spouse. Most importantly, there must not be any appearance that the judge is being influenced in the performance of judicial duties or the appearance of any other impropriety. As with other canons, the activity permitted under Canon 6 is permissible only if it does not violate the provisions of any of the other canons. For example, a judge would be prohibited from speaking so frequently before groups that the speaking engagements interfered with the judge's judicial duties. Fla. Code Jud. Conduct, Canon 3A and Commentary to Canon 6A.

Sections B and C of Canon 6 contain the judicial financial reporting requirements. A judge must file the same public reports required by law for all public officials

under article II, section 8, of the Florida Constitution. Judges also must file a public report of all gifts that are required to be disclosed under Canon 5D(5)(h).

In addition, Canon 6C requires that judges provide to the JQC a list of the corporations and other business entities in which the judge has a financial interest, unless the judge has provided that list in the report required under Canon 6B. The report to the commission is confidential, except that a party may request information during or after the pendency of a cause as to whether the judge has a financial interest in particular business entities.

7. Canon 7: A Judge or Candidate for Judicial Office Shall Refrain From Inappropriate Political Activity

The provisions of Canon 7 apply both to judges and to candidates for judicial office. Generally, judges and candidates for election or appointment to judicial office are prohibited from acting as leaders in a political organization, publicly endorsing or opposing another candidate for public office, making speeches on behalf of political organizations, attending political gatherings, or asking for or making contributions to political organizations or candidates. Judges must also resign from judicial office when they become candidates for nonjudicial offices except while a candidate for a position in a state constitutional convention.

Under Canon 7A(3), a candidate for judicial office is required to maintain the dignity appropriate to judicial office and to encourage his or her family to adhere to the same standards that apply to the candidate. A candidate must prohibit those who serve at his or her pleasure from doing on the candidate's behalf what the candidate is prohibited from doing under Canon 7.

Candidates for judicial office are prohibited from making "pledges, promises, or commitments that are inconsistent with the impartial performance of the adjudicative duties of the office." Fla. Code Jud. Conduct, Canon 7A(3)(e)(i). They may not knowingly misrepresent information concerning themselves or an opponent, but they may respond to personal attacks or attacks on their record, as long as they do so in accordance with Canon 7A(3)(e). In 2005, the Florida Supreme Court amended Canon 7A(3)(d) to add a provision which states that while a proceeding is pending or impending in any court, a judicial candidate shall not make any public comment that might reasonably be expected to affect its outcome or impair its fairness or make any nonpublic comment that might substantially interfere with a fair trial or hearing. This section does not apply to proceedings in which the judicial candidate is a litigant in a personal capacity. Fla. Code Jud. Conduct, Canon 7A(3)(d)(iii) [now Canon 7A(3)(e)(iii)].

Canon 7B regulates candidates seeking appointment to judicial or other governmental office. Candidates for appointment to judicial office and judges seeking another governmental office are prohibited from soliciting or accepting funds in any way. Their political activities are limited to communicating with the appointing authority, seeking support or endorsement from organizations that, and individuals who, regularly make recommendations for appointment to the office, and providing information about their qualifications for the office. Non-judge candidates for appointment to judicial office may retain an office in a political organization, attend political gatherings, and continue to contribute financially to political organizations or candidates.

Canon 7C provides specific guidance for judges and judicial candidates subject to public election. All candidates for a judicial office that is filled by public election are prohibited from personally soliciting funds or attorneys for publicly-stated support. Such candidates may, however, establish committees to secure and manage the expenditure of funds for the campaign and to obtain public statements of support for the candidacy. Formerly, candidates were prohibited from spending funds for their campaign or establishing a committee to solicit contributions or public support earlier than one year before the general election. This prohibition was deleted from the code in *In re Code of Judicial Conduct*, 659 So. 2d 692 (Fla. 1995). Candidates may not use campaign contributions for their private benefit.

A candidate for merit retention in office may conduct only limited campaign activities until he or she certifies that the candidacy has drawn active opposition. Such merit retention candidates may campaign more freely after mailing a certificate in writing to the Secretary of State and JQC that their candidacy has drawn active opposition, including "campaigning together and conducting a joint campaign designed to educate the public on merit retention and each candidate's views as to why he or she should be retained in office, to the extent not otherwise prohibited by Florida law."

Canon 7C(3) provides that a judicial candidate involved in an election or re-election who has qualified for judicial office, or a merit retention candidate who has certified that he or she has active opposition, may participate in some political functions. For example, the candidate may attend a political party function to speak on behalf of his or her candidacy or on a matter regarding the law, the improvement of the legal system, or the administration of justice. The function must not be a fund-raiser, and other candidates for that office must be invited. Such candidates attending a political party function must avoid suggesting that they support or oppose a political party, a political issue, or another candidate.

Canon 7D restricts the political activity that may be engaged in by incumbent judges. Canon 7E states that Canon 7 applies to all incumbent judges and judicial candidates. A successful candidate is subject to judicial discipline for his or her campaign conduct, while an unsuccessful candidate who is a lawyer is subject to lawyer discipline under rule 4-8.2(b), Rules Regulating The Florida Bar.

Application of the Code of Judicial Conduct

Generally, the code applies to justices of the supreme court and judges of the district courts of appeal, circuit courts, and county courts. The code applies in part to anyone who performs judicial functions, including, but not limited to, civil traffic infraction hearing officers, court commissioners, general or special magistrates, child support hearing officers, and judges of compensation claims. Retired judges eligible to serve on assignment to temporary judicial duty shall comply with all provisions of the code except Canons 5C(2), 5E, 5F(1), and 6A.

Appendix III

Florida Code of Judicial Conduct

Adopted September 29, 1994, effective Jan. 1, 1995 (643 So. 2d 1037).

As amended through May 10, 2018 (242 So. 3d 319).

Preamble

Definitions

Canons

1. A Judge Shall Uphold the Integrity and Independence of the Judiciary.

2. A Judge Shall Avoid Impropriety and the Appearance of Impropriety in all of the Judge's Activities.

3. A Judge Shall Perform the Duties of Judicial Office Impartially and Diligently.

4. A Judge is Encouraged to Engage in Activities to Improve the Law, the Legal System, and the Administration of Justice.

5. A Judge Shall Regulate Extrajudicial Activities to Minimize the Risk of Conflict with Judicial Duties.

    A. Extrajudicial Activities in General.

    B. Avocational Activities.

    C. Governmental, Civic or Charitable Activities.

    D. Financial Activities.

    E. Fiduciary Activities.

    F. Service as Arbitrator or Mediator.

    G. Practice of Law.

6. Fiscal Matters of a Judge Shall be Conducted in a Manner That Does Not

Give the Appearance of Influence or Impropriety; a Judge Shall Regularly File Public Reports as Required by Article II, Section 8, of the Constitution of Florida, and Shall Publicly Report Gifts, Expense Reimbursements and Payments, and Waivers of Fees or Charges; Additional Financial Information Shall be Filed with the Judicial Qualifications Commission to Ensure Full Financial Disclosure.

A. Compensation for Quasi-Judicial and Extrajudicial Services and Reimbursement of Expenses.

B. Public Financial Reporting.

C. Confidential Financial Reporting to the Judicial Qualifications Commission.

D. Limitation of Disclosure.

7. A Judge or Candidate for Judicial Office Shall Refrain From Inappropriate Political Activity.

A. All Judges and Candidates.

B. Candidates Seeking Appointment to Judicial or Other Governmental Office.

C. Judges and Candidates Subject to Public Election.

D. Incumbent Judges.

E. Applicability.

F. Statement of Candidate for Judicial Office.

Application of the Code of Judicial Conduct.

A. Civil Traffic Infraction Hearing Officer.

B. Retired/Senior Judge.

Effective Date of Compliance.

Preamble

Our legal system is based on the principle that an independent, fair and competent judiciary will interpret and apply the laws that govern us. The role of the judiciary is central to American concepts of justice and the rule of law. Intrinsic to all sections of this Code are the precepts that judges, individually and collectively, must respect and honor the judicial office as a public trust and strive to enhance and maintain confidence in our legal system. The judge is an arbiter of facts and law for the resolution of disputes and a highly visible symbol of government under the rule of law.

The Code of Judicial Conduct establishes standards for ethical conduct of judges. It consists of broad statements called Canons, specific rules set forth in Sections under each Canon, a Definitions Section, an Application Section and Commentary. The text of the Canons and the Sections, including the Definitions and Application Sections, is authoritative. The Commentary, by explanation and example, provides guidance with respect to the purpose and meaning of the Canons and Sections. The Commentary is not intended as a statement of additional rules. When the text uses "shall" or "shall not," it is intended to impose binding obligations the violation of which, if proven, can result in disciplinary action. When "should" or "should not" is used, the text is intended as hortatory and as a statement of what is or is not appropriate conduct but not as a binding rule under which a judge may be disciplined. When "may" is used, it denotes permissible discretion or, depending on the context, it refers to action that is not covered by specific proscriptions.

The Canons and Sections are rules of reason. They should be applied consistent with constitutional requirements, statutes, other court rules and decisional law and in the context of all relevant circumstances. The Code is not to be construed to impinge on the essential independence of judges in making judicial decisions.

The Code is designed to provide guidance to judges and candidates for judicial office and to provide a structure for regulating conduct through disciplinary agencies. It is not designed or intended as a basis for civil liability or criminal prosecution. Furthermore, the purpose of the Code would be subverted if the Code were invoked by lawyers for mere tactical advantage in a proceeding.

The text of the Canons and Sections is intended to govern conduct of judges and to be binding upon them. It is not intended, however, that every transgression will result in disciplinary action. Whether disciplinary action is appropriate, and the degree of discipline to be imposed, should be determined through a reasonable and

reasoned application of the text and should depend on such factors as the seriousness of the transgression, whether there is a pattern of improper activity and the effect of the improper activity on others or on the judicial system.

The Code of Judicial Conduct is not intended as an exhaustive guide for the conduct of judges. They should also be governed in their judicial and personal conduct by general ethical standards. The Code is intended, however, to state basic standards which should govern the conduct of all judges and to provide guidance to assist judges in establishing and maintaining high standards of judicial and personal conduct.

Definitions

"Appropriate authority" denotes the authority with responsibility for initiation of disciplinary process with respect to the violation to be reported.

"Candidate." A candidate is a person seeking selection for or retention in judicial office by election or appointment. A person becomes a candidate for judicial office as soon as he or she makes a public announcement of candidacy, opens a campaign account as defined by Florida law, declares or files as a candidate with the election or appointment authority, or authorizes solicitation or acceptance of contributions or support. The term "candidate" has the same meaning when applied to a judge seeking election or appointment to nonjudicial office.

"Court personnel" does not include the lawyers in a proceeding before a judge.

"De minimis" denotes an insignificant interest that could not raise reasonable question as to a judge's impartiality.

"Economic interest" denotes ownership of a more than de minimis legal or equitable interest, or a relationship as officer, director, advisor, or other active participant in the affairs of a party, except that:

(i) ownership of an interest in a mutual or common investment fund that holds securities is not an economic interest in such securities unless the judge participates in the management of the fund or a proceeding pending or impending before the judge could substantially affect the value of the interest;

(ii) service by a judge as an officer, director, advisor, or other active participant in an educational, religious, charitable, fraternal, sororal, or civic organization, or service by a judge's spouse, parent, or child as an officer, director, advisor, or other active participant in any organization does not create an economic interest in securities held by that organization;

(iii) a deposit in a financial institution, the proprietary interest of a policy holder in a mutual insurance company, of a depositor in a mutual savings association, or of a member in a credit union, or a similar proprietary interest, is not an economic interest in the organization unless a proceeding pending or impending before the judge could substantially affect the value of the interest;

(iv) ownership of government securities is not an economic interest in the issuer unless a proceeding pending or impending before the judge could substantially

affect the value of the securities.

"Fiduciary" includes such relationships as personal representative, administrator, trustee, guardian, and attorney in fact.

"Impartiality" or "impartial" denotes absence of bias or prejudice in favor of, or against, particular parties or classes of parties, as well as maintaining an open mind in considering issues that may come before the judge.

"Judge." When used herein this term means Article V, Florida Constitution judges and, where applicable, those persons performing judicial functions under the direction or supervision of an Article V judge.

"Knowingly," "knowledge," "known," or "knows" denotes actual knowledge of the fact in question. A person's knowledge may be inferred from circumstances.

"Law" denotes court rules as well as statutes, constitutional provisions, and decisional law.

"Member of the candidate's family" denotes a spouse, child, grandchild, parent, grandparent, or other relative or person with whom the candidate maintains a close familial relationship.

"Member of the judge's family" denotes a spouse, child, grandchild, parent, grandparent, or other relative or person with whom the judge maintains a close familial relationship.

"Member of the judge's family residing in the judge's household" denotes any relative of a judge by blood or marriage, or a person treated by a judge as a member of the judge's family, who resides in the judge's household.

"Nonpublic information" denotes information that, by law, is not available to the public. Nonpublic information may include but is not limited to: information that is sealed by statute or court order, impounded or communicated in camera; and information offered in grand jury proceedings, presentencing reports, dependency cases, or psychiatric reports.

"Political organization" denotes a political party or other group, the principal purpose of which is to further the election or appointment of candidates to political office.

"Public election." This term includes primary and general elections; it includes

partisan elections, nonpartisan elections, and retention elections.

"Require." The rules prescribing that a judge "require" certain conduct of others are, like all of the rules in this Code, rules of reason. The use of the term "require" in that context means a judge is to exercise reasonable direction and control over the conduct of those persons subject to the judge's direction and control.

"Third degree of relationship." The following persons are relatives within the third degree of relationship: great-grandparent, grandparent, parent, uncle, aunt, brother, sister, child, grandchild, great-grandchild, nephew, or niece.

[Amended Jan. 5, 2006 (918 So. 2d 949).]

Canon 1

A Judge Shall Uphold the Integrity And Independence of the Judiciary

An independent and honorable judiciary is indispensable to justice in our society. A judge should participate in establishing, maintaining, and enforcing high standards of conduct, and shall personally observe those standards so that the integrity and independence of the judiciary may be preserved. The provisions of this Code should be construed and applied to further that objective.

COMMENTARY

Deference to the judgments and rulings of courts depends upon public confidence in the integrity and independence of judges. The integrity and independence of judges depend in turn upon their acting without fear or favor. Although judges should be independent, they must comply with the law, including the provisions of this Code. Public confidence in the impartiality of the judiciary is maintained by the adherence of each judge to this responsibility. Conversely, violation of this Code diminishes public confidence in the judiciary and thereby does injury to the system of government under law.

Canon 2

A Judge Shall Avoid Impropriety and the Appearance of Impropriety in all of the Judge's Activities

A. A judge shall respect and comply with the law and shall act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary.

B. A judge shall not allow family, social, political or other relationships to influence the judge's judicial conduct or judgment. A judge shall not lend the prestige of judicial office to advance the private interests of the judge or others; nor shall a judge convey or permit others to convey the impression that they are in a special position to influence the judge. A judge shall not testify voluntarily as a character witness.

C. A judge should not hold membership in an organization that practices invidious discrimination on the basis of race, sex, religion, or national origin. Membership in a fraternal, sororal, religious, or ethnic heritage organization shall not be deemed to be a violation of this provision.

COMMENTARY

Canon 2A. Irresponsible or improper conduct by judges erodes public confidence in the judiciary. A judge must avoid all impropriety and appearance of impropriety. A judge must expect to be the subject of constant public scrutiny. A judge must therefore accept restrictions on the judge's conduct that might be viewed as burdensome by the ordinary citizen and should do so freely and willingly. Examples are the restrictions on judicial speech imposed by Sections 3B(9) and (10) that are indispensable to the maintenance of the integrity, impartiality, and independence of the judiciary.

The prohibition against behaving with impropriety or the appearance of impropriety applies to both the professional and personal conduct of a judge. Because it is not practicable to list all prohibited acts, the proscription is necessarily cast in general terms that extend to conduct by judges that is harmful although not specifically mentioned in the Code. Actual improprieties under this standard include violations of law, court rules, or other specific provisions of this Code. The test for appearance of impropriety is whether the conduct would create in reasonable minds, with knowledge of all the relevant circumstances that a reasonable inquiry would disclose, a perception that the judge's ability to carry out judicial responsibilities with integrity, impartiality, and competence is impaired.

See also Commentary under Section 2C.

Canon 2B. Maintaining the prestige of judicial office is essential to a system of government in which the judiciary functions independently of the executive and legislative branches. Respect for the judicial office facilitates the orderly conduct of legitimate judicial functions. Judges should distinguish between proper and improper use of the prestige of office in all of their activities. For example, it would be improper for a judge to allude to his or her judgeship to gain a personal advantage such as deferential treatment when stopped by a police officer for a traffic offense. Similarly, judicial letterhead must not be used for conducting a judge's personal business, although a judge may use judicial letterhead to write character reference letters when such letters are otherwise permitted under this Code.

A judge must avoid lending the prestige of judicial office for the advancement of the private interests of others. For example, a judge must not use the judge's judicial position to gain advantage in a civil suit involving a member of the judge's family. In contracts for publication of a judge's writings, a judge should retain control over the advertising to avoid exploitation of the judge's office. As to the

acceptance of awards, see Section 5D(5) and Commentary.

Although a judge should be sensitive to possible abuse of the prestige of office, a judge may, based on the judge's personal knowledge, serve as a reference or provide a letter of recommendation. However, a judge must not initiate the communication of information to a sentencing judge or a probation or corrections officer but may provide to such persons information for the record in response to a formal request.

Judges may participate in the process of judicial selection by cooperating with appointing authorities and screening committees seeking names for consideration, and by responding to official inquiries concerning a person being considered for a judgeship. See also Canon 7 regarding use of a judge's name in political activities.

A judge must not testify voluntarily as a character witness because to do so may lend the prestige of the judicial office in support of the party for whom the judge testifies. Moreover, when a judge testifies as a witness, a lawyer who regularly appears before the judge may be placed in the awkward position of cross-examining the judge. A judge may, however, testify when properly summoned. Except in unusual circumstances where the demands of justice require, a judge should discourage a party from requiring the judge to testify as a character witness.

Canon 2C. Florida Canon 2C is derived from a recommendation by the American Bar Association and from the United States Senate Committee Resolution, 101st Congress, Second Session, as adopted by the United States Senate Judiciary Committee on August 2, 1990.

Membership of a judge in an organization that practices invidious discrimination gives rise to perceptions that the judge's impartiality is impaired. Whether an organization practices invidious discrimination is often a complex question to which judges should be sensitive. The answer cannot be determined from a mere examination of an organization's current membership rolls but rather depends on the history of the organization's selection of members and other relevant factors, such as that the organization is dedicated to the preservation of religious, ethnic, or cultural values of legitimate common interest to its members, or that it is in fact and effect an intimate, purely private organization whose membership limitations could not be constitutionally prohibited. See New York State Club Ass'n, Inc. v. City of New York, 487 U.S. 1, 108 S.Ct. 2225, 101 L.Ed.2d 1 (1988); Board of Directors of Rotary International v. Rotary Club of Duarte, 481 U.S. 537, 107 S.Ct. 1940, 95 L.Ed.2d 474 (1987); Roberts v. United States Jaycees, 468 U.S. 609, 104 S.Ct. 3244, 82 L.Ed.2d 462 (1984). Other relevant factors include the size and

nature of the organization and the diversity of persons in the locale who might reasonably be considered potential members. Thus the mere absence of diverse membership does not by itself demonstrate a violation unless reasonable persons with knowledge of all the relevant circumstances would expect that the membership would be diverse in the absence of invidious discrimination. Absent such factors, an organization is generally said to discriminate invidiously if it arbitrarily excludes from membership on the basis of race, religion, sex, or national origin persons who would otherwise be admitted to membership.

This Canon is not intended to prohibit membership in religious and ethnic clubs, such as Knights of Columbus, Masons, B'nai B'rith, and Sons of Italy; civic organizations, such as Rotary, Kiwanis, and The Junior League; young people's organizations, such as Boy Scouts, Girl Scouts, Boy's Clubs, and Girl's Clubs; and charitable organizations, such as United Way and Red Cross.

Although Section 2C relates only to membership in organizations that invidiously discriminate on the basis of race, sex, religion or national origin, a judge's membership in an organization that engages in any discriminatory membership practices prohibited by the law of the jurisdiction also violates Canon 2 and Section 2A and gives the appearance of impropriety. In addition, it would be a violation of Canon 2 and Section 2A for a judge to arrange a meeting at a club that the judge knows practices invidious discrimination on the basis of race, sex, religion or national origin in its membership or other policies, or for the judge to regularly use such a club. Moreover, public manifestation by a judge of the judge's knowing approval of invidious discrimination on any basis gives the appearance of impropriety under Canon 2 and diminishes public confidence in the integrity and impartiality of the judiciary, in violation of Section 2A.

When a person who is a judge on the date this Code becomes effective learns that an organization to which the judge belongs engages in invidious discrimination that would preclude membership under Section 2C or under Canon 2 and Section 2A, the judge is permitted, in lieu of resigning, to make immediate efforts to have the organization discontinue its invidiously discriminatory practices, but is required to suspend participation in any other activities of the organization. If the organization fails to discontinue its invidiously discriminatory practices as promptly as possible (and in all events within a year of the judge's first learning of the practices), the judge is required to resign immediately from the organization.

[Commentary amended Jan. 5, 2006 (918 So. 2d 949).]

Canon 3

A Judge Shall Perform the Duties of Judicial Office Impartially and Diligently

A. Judicial Duties in General.

The judicial duties of a judge take precedence over all the judge's other activities. The judge's judicial duties include all the duties of the judge's office prescribed by law. In the performance of these duties, the specific standards set forth in the following sections apply.

B. Adjudicative Responsibilities.

(1) A judge shall hear and decide matters assigned to the judge except those in which disqualification is required.

(2) A judge shall be faithful to the law and maintain professional competence in it. A judge shall not be swayed by partisan interests, public clamor, or fear of criticism.

(3) A judge shall require order and decorum in proceedings before the judge.

(4) A judge shall be patient, dignified, and courteous to litigants, jurors, witnesses, lawyers, and others with whom the judge deals in an official capacity, and shall require similar conduct of lawyers, and of staff, court officials, and others subject to the judge's direction and control.

(5) A judge shall perform judicial duties without bias or prejudice. A judge shall not, in the performance of judicial duties, by words or conduct manifest bias or prejudice, including but not limited to bias or prejudice based upon race, sex, religion, national origin, disability, age, sexual orientation, or socioeconomic status, and shall not permit staff, court officials, and others subject to the judge's direction and control to do so. This section does not preclude the consideration of race, sex, religion, national origin, disability, age, sexual orientation, socioeconomic status, or other similar factors when they are issues in the proceeding.

(6) A judge shall require lawyers in proceedings before the judge to refrain from manifesting, by words, gestures, or other conduct, bias or prejudice based upon race, sex, religion, national origin, disability, age, sexual orientation, or socioeconomic status, against parties, witnesses, counsel, or others. This Section 3B(6) does not preclude legitimate advocacy when race, sex, religion, national

origin, disability, age, sexual orientation, socioeconomic status, or other similar factors are issues in the proceeding.

(7) A judge shall accord to every person who has a legal interest in a proceeding, or that person's lawyer, the right to be heard according to law. A judge shall not initiate, permit, or consider ex parte communications, or consider other communications made to the judge outside the presence of the parties concerning a pending or impending proceeding except that:

(a) Where circumstances require, ex parte communications for scheduling, administrative purposes, or emergencies that do not deal with substantive matters or issues on the merits are authorized, provided:

(i) the judge reasonably believes that no party will gain a procedural or tactical advantage as a result of the ex parte communication, and

(ii) the judge makes provision promptly to notify all other parties of the substance of the ex parte communication and allows an opportunity to respond.

(b) A judge may obtain the advice of a disinterested expert on the law applicable to a proceeding before the judge if the judge gives notice to the parties of the person consulted and the substance of the advice and affords the parties reasonable opportunity to respond.

(c) A judge may consult with other judges or with court personnel whose function is to aid the judge in carrying out the judge's adjudicative responsibilities.

(d) A judge may, with the consent of the parties, confer separately with the parties and their lawyers in an effort to mediate or settle matters pending before the judge.

(e) A judge may initiate or consider any ex parte communications when expressly authorized by law to do so.

(8) A judge shall dispose of all judicial matters promptly, efficiently, and fairly.

(9) A judge shall not, while a proceeding is pending or impending in any court, make any public comment that might reasonably be expected to affect its outcome or impair its fairness or make any nonpublic comment that might substantially interfere with a fair trial or hearing. The judge shall require similar abstention on the part of court personnel subject to the judge's direction and control. This Section does not prohibit judges from making public statements in the course of

their official duties or from explaining for public information the procedures of the court. This Section does not apply to proceedings in which the judge is a litigant in a personal capacity.

(10) A judge shall not, with respect to parties or classes of parties, cases, controversies or issues likely to come before the court, make pledges, promises or commitments that are inconsistent with the impartial performance of the adjudicative duties of the office.

(11) A judge shall not commend or criticize jurors for their verdict other than in a court order or opinion in a proceeding, but may express appreciation to jurors for their service to the judicial system and the community.

(12) A judge shall not disclose or use, for any purpose unrelated to judicial duties, nonpublic information acquired in a judicial capacity.

C. Administrative Responsibilities.

(1) A judge shall diligently discharge the judge's administrative responsibilities without bias or prejudice and maintain professional competence in judicial administration, and should cooperate with other judges and court officials in the administration of court business.

(2) A judge shall require staff, court officials, and others subject to the judge's direction and control to observe the standards of fidelity and diligence that apply to the judge and to refrain from manifesting bias or prejudice in the performance of their official duties.

(3) A judge with supervisory authority for the judicial performance of other judges shall take reasonable measures to assure the prompt disposition of matters before them and the proper performance of their other judicial responsibilities.

(4) A judge shall not make unnecessary appointments. A judge shall exercise the power of appointment impartially and on the basis of merit. A judge shall avoid nepotism and favoritism. A judge shall not approve compensation of appointees beyond the fair value of services rendered.

D. Disciplinary Responsibilities.

(1) A judge who receives information or has actual knowledge that substantial likelihood exists that another judge has committed a violation of this Code shall take appropriate action.

(2) A judge who receives information or has actual knowledge that substantial likelihood exists that a lawyer has committed a violation of the Rules Regulating The Florida Bar shall take appropriate action.

(3) Acts of a judge, in the discharge of disciplinary responsibilities, required or permitted by Sections 3D(1) and 3D(2) are part of a judge's judicial duties and shall be absolutely privileged, and no civil action predicated thereon may be instituted against the judge.

E. Disqualification.

(1) A judge shall disqualify himself or herself in a proceeding in which the judge's impartiality might reasonably be questioned, including but not limited to instances where:

(a) the judge has a personal bias or prejudice concerning a party or a party's lawyer, or personal knowledge of disputed evidentiary facts concerning the proceeding;

(b) the judge served as a lawyer or was the lower court judge in the matter in controversy, or a lawyer with whom the judge previously practiced law served during such association as a lawyer concerning the matter, or the judge has been a material witness concerning it;

(c) the judge knows that he or she individually or as a fiduciary, or the judge's spouse, parent, or child wherever residing, or any other member of the judge's family residing in the judge's household has an economic interest in the subject matter in controversy or in a party to the proceeding or has any other more than de minimis interest that could be substantially affected by the proceeding;

(d) the judge or the judge's spouse, or a person within the third degree of relationship to either of them, or the spouse of such a person:

(i) is a party to the proceeding, or an officer, director, or trustee of a party;

(ii) is acting as a lawyer in the proceeding;

(iii) is known by the judge to have a more than de minimus interest that could be substantially affected by the proceeding;

(iv) is to the judge's knowledge likely to be a material witness in the proceeding.

(e) the judge's spouse or a person within the third degree of relationship to the

judge participated as a lower court judge in a decision to be reviewed by the judge;

(f) the judge, while a judge or a candidate for judicial office, has made a public statement that commits, or appears to commit the judge with respect to:

(i) parties or classes of parties in the proceeding;

(ii) an issue in the proceeding; or

(iii) the controversy in the proceeding.

(2) A judge should keep informed about the judge's personal and fiduciary economic interests, and make a reasonable effort to keep informed about the economic interests of the judge's spouse and minor children residing in the judge's household.

F. Remittal of Disqualification.

A judge disqualified by the terms of Section 3E may disclose on the record the basis of the judge's disqualification and may ask the parties and their lawyers to consider, out of the presence of the judge, whether to waive disqualification. If following disclosure of any basis for disqualification other than personal bias or prejudice concerning a party, the parties and lawyers, without participation by the judge, all agree the judge should not be disqualified, and the judge is then willing to participate, the judge may participate in the proceeding. The agreement shall be incorporated in the record of the proceeding.

[Amended Jan. 23, 2003 (838 So. 2d 521); Jan. 5, 2006 (918 So. 2d 949).]

COMMENTARY

Canon 3B(4). The duty to hear all proceedings fairly and with patience is not inconsistent with the duty to dispose promptly of the business of the court. Judges can be efficient and business-like while being patient and deliberate.

Canon 3B(5). A judge must refrain from speech, gestures or other conduct that could reasonably be perceived as sexual harassment and must require the same standard of conduct of others subject to the judge's direction and control.

A judge must perform judicial duties impartially and fairly. A judge who manifests bias on any basis in a proceeding impairs the fairness of the proceeding and brings the judiciary into disrepute. Facial expression and body language, in addition to oral communication, can give to parties or lawyers in the proceeding, jurors, the

media and others an appearance of judicial bias. A judge must be alert to avoid behavior that may be perceived as prejudicial.

Canon 3B(7). The proscription against communications concerning a proceeding includes communications from lawyers, law teachers, and other persons who are not participants in the proceeding, except to the limited extent permitted.

To the extent reasonably possible, all parties or their lawyers shall be included in communications with a judge.

Whenever presence of a party or notice to a party is required by Section 3B(7), it is the party's lawyer, or if the party is unrepresented, the party who is to be present or to whom notice is to be given.

An appropriate and often desirable procedure for a court to obtain the advice of a disinterested expert on legal issues is to invite the expert to file a brief as amicus curiae.

Certain ex parte communication is approved by Section 3B(7) to facilitate scheduling and other administrative purposes and to accommodate emergencies. In general, however, a judge must discourage ex parte communication and allow it only if all the criteria stated in Section 3B(7) are clearly met. A judge must disclose to all parties all ex parte communications described in Sections 3B(7)(a) and 3B(7)(b) regarding a proceeding pending or impending before the judge.

A judge must not independently investigate facts in a case and must consider only the evidence presented.

A judge may request a party to submit proposed findings of fact and conclusions of law, so long as the other parties are apprised of the request and are given an opportunity to respond to the proposed findings and conclusions.

A judge must make reasonable efforts, including the provision of appropriate supervision, to ensure that Section 3B(7) is not violated through law clerks or other personnel on the judge's staff.

If communication between the trial judge and the appellate court with respect to a proceeding is permitted, a copy of any written communication or the substance of any oral communication should be provided to all parties.

Canon 3B(8). In disposing of matters promptly, efficiently, and fairly, a judge must demonstrate due regard for the rights of the parties to be heard and to have issues

resolved without unnecessary cost or delay. Containing costs while preserving fundamental rights of parties also protects the interests of witnesses and the general public. A judge should monitor and supervise cases so as to reduce or eliminate dilatory practices, avoidable delays, and unnecessary costs. A judge should encourage and seek to facilitate settlement, but parties should not feel coerced into surrendering the right to have their controversy resolved by the courts.

Prompt disposition of the court's business requires a judge to devote adequate time to judicial duties, to be punctual in attending court and expeditious in determining matters under submission, and to insist that court officials, litigants, and their lawyers cooperate with the judge to that end.

Canon 3B(9) and 3B(10). Sections 3B(9) and (10) restrictions on judicial speech are essential to the maintenance of the integrity, impartiality, and independence of the judiciary. A pending proceeding is one that has begun but not yet reached final disposition. An impending proceeding is one that is anticipated but not yet begun. The requirement that judges abstain from public comment regarding a pending or impending proceeding continues during any appellate process and until final disposition. Sections 3B(9) and (10) do not prohibit a judge from commenting on proceedings in which the judge is a litigant in a personal capacity, but in cases such as a writ of mandamus where the judge is a litigant in an official capacity, the judge must not comment publicly. The conduct of lawyers relating to trial publicity is governed by Rule 4-3.6 of the Rules Regulating The Florida Bar.

Canon 3B(10). Commending or criticizing jurors for their verdict may imply a judicial expectation in future cases and may impair a juror's ability to be fair and impartial in a subsequent case.

Canon 3C(4). Appointees of a judge include assigned counsel, officials such as referees, commissioners, special magistrates, receivers, mediators, arbitrators, and guardians and personnel such as clerks, secretaries, and bailiffs. Consent by the parties to an appointment or an award of compensation does not relieve the judge of the obligation prescribed by Section 3C(4). See also Fla. Stat. § 112.3135 (1991).

Canon 3D. Appropriate action may include direct communication with the judge or lawyer who has committed the violation, other direct action if available, or reporting the violation to the appropriate authority or other agency. If the conduct is minor, the Canon allows a judge to address the problem solely by direct communication with the offender. A judge having knowledge, however, that another judge has committed a violation of this Code that raises a substantial

question as to that other judge's fitness for office or has knowledge that a lawyer has committed a violation of the Rules of Professional Conduct that raises a substantial question as to the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects, is required under this Canon to inform the appropriate authority. While worded differently, this Code provision has the identical purpose as the related Model Code provisions.

Canon 3E(1). Under this rule, a judge is disqualified whenever the judge's impartiality might reasonably be questioned, regardless of whether any of the specific rules in Section 3E(1) apply. For example, if a judge were in the process of negotiating for employment with a law firm, the judge would be disqualified from any matters in which that law firm appeared, unless the disqualification was waived by the parties after disclosure by the judge.

A judge should disclose on the record information that the judge believes the parties or their lawyers might consider relevant to the question of disqualification, even if the judge believes there is no real basis for disqualification. The fact that the judge conveys this information does not automatically require the judge to be disqualified upon a request by either party, but the issue should be resolved on a case-by-case basis. Similarly, if a lawyer or party has previously filed a complaint against the judge with the Judicial Qualifications Commission, that fact does not automatically require disqualification of the judge. Such disqualification should be on a case-by-case basis.

By decisional law, the rule of necessity may override the rule of disqualification. For example, a judge might be required to participate in judicial review of a judicial salary statute, or might be the only judge available in a matter requiring immediate judicial action, such as a hearing on probable cause or a temporary restraining order. In the latter case, the judge must disclose on the record the basis for possible disqualification and use reasonable efforts to transfer the matter to another judge as soon as practicable.

Canon 3E(1)(b). A lawyer in a government agency does not ordinarily have an association with other lawyers employed by that agency within the meaning of Section 3E(1)(b); a judge formerly employed by a government agency, however, should disqualify himself or herself in a proceeding if the judge's impartiality might reasonably be questioned because of such association.

Canon 3E(1)(d). The fact that a lawyer in a proceeding is affiliated with a law firm with which a relative of the judge is affiliated does not of itself disqualify the judge. Under appropriate circumstances, the fact that "the judge's impartiality

might reasonably be questioned" under Section 3E(1), or that the relative is known by the judge to have an interest in the law firm that could be "substantially affected by the outcome of the proceeding" under Section 3E(1)(d)(iii) may require the judge's disqualification.

Canon 3E(1)(e). It is not uncommon for a judge's spouse or a person within the third degree of relationship to a judge to also serve as a judge in either the trial or appellate courts. However, where a judge exercises appellate authority over another judge, and that other judge is either a spouse or a relationship within the third degree, then this Code requires disqualification of the judge that is exercising appellate authority. This Code, under these circumstances, precludes the appellate judge from participating in the review of the spouse's or relation's case.

Canon 3F. A remittal procedure provides the parties an opportunity to proceed without delay if they wish to waive the disqualification. To assure that consideration of the question of remittal is made independently of the judge, a judge must not solicit, seek, or hear comment on possible remittal or waiver of the disqualification unless the lawyers jointly propose remittal after consultation as provided in the rule. A party may act through counsel if counsel represents on the record that the party has been consulted and consents. As a practical matter, a judge may wish to have all parties and their lawyers sign the remittal agreement.

[Commentary amended June 15, 1995 (656 So. 2d 926); Aug. 24, 1995 (659 So. 2d 692); Nov. 9, 1995 (662 So. 2d 930); Jan. 23, 2003 (838 So. 2d 521); Jan. 5, 2006 (918 So. 2d 949).

Canon 4

A Judge Is Encouraged to Engage in Activities to Improve the Law, the Legal System, and the Administration of Justice

A. A judge shall conduct all of the judge's quasi-judicial activities so that they do not:
(1) cast reasonable doubt on the judge's capacity to act impartially as a judge;
(2) undermine the judge's independence, integrity, or impartiality;
(3) demean the judicial office;
(4) interfere with the proper performance of judicial duties;
(5) lead to frequent disqualification of the judge; or
(6) appear to a reasonable person to be coercive.

B. A judge is encouraged to speak, write, lecture, teach and participate in other

quasi-judicial activities concerning the law, the legal system, the administration of justice, and the role of the judiciary as an independent branch within our system of government, subject to the requirements of this Code.

C. A judge shall not appear at a public hearing before, or otherwise consult with an executive or legislative body or official except on matters concerning the law, the legal system or the administration of justice or except when acting pro se in a matter involving the judge or the judge's interests.

D. A judge is encouraged to serve as a member, officer, director, trustee or non-legal advisor of an organization or governmental entity devoted to the improvement of the law, the legal system, the judicial branch, or the administration of justice, subject to the following limitations and the other requirements of this Code.

(1) A judge shall not serve as an officer, director, trustee or non-legal advisor if it is likely that the organization

(a) will be engaged in proceedings that would ordinarily come before the judge, or

(b) will be engaged frequently in adversary proceedings in the court of which the judge is a member or in any court subject to the appellate jurisdiction of the court of which the judge is a member.

(2) A judge as an officer, director, trustee or non-legal advisor, or as a member or otherwise:

(a) may assist such an organization in planning fund-raising and may participate in the management and investment of the organization's funds, but shall not personally or directly participate in the solicitation of funds, except that a judge may solicit funds from other judges over whom the judge does not exercise supervisory or appellate authority;

(b) may appear or speak at, receive an award or other recognition at, be featured on the program of, and permit the judge's title to be used in conjunction with an event of such an organization or entity, but if the event serves a fund-raising purpose, the judge may participate only if the event concerns the law, the legal system, or the administration of justice and the funds raised will be used for a law related purpose(s);

(c) may make recommendations to public and private fund-granting

organizations on projects and programs concerning the law, the legal system or the administration of justice;

(d) shall not personally or directly participate in membership solicitation if the solicitation might reasonably be perceived as coercive;

(e) shall not make use of court premises, staff, stationery, equipment, or other resources for fund-raising purposes, except for incidental use for activities that concern the law, the legal system, or the administration of justice, subject to the requirements of this Code.

[Amended Feb. 20, 2003 (840 So. 2d 1023); May 22, 2008 (983 So. 2d 550).]

COMMENTARY

Canon 4A. A judge is encouraged to participate in activities designed to improve the law, the legal system, and the administration of justice. In doing so, however, it must be understood that expressions of bias or prejudice by a judge, even outside the judge's judicial activities, may cast reasonable doubt on the judge's capacity to act impartially as a judge and may undermine the independence and integrity of the judiciary. Expressions which may do so include jokes or other remarks demeaning individuals on the basis of their race, sex, religion, national origin, disability, age, sexual orientation or socioeconomic status. See Canon 2C and accompanying Commentary.

Canon 4B. This canon was clarified in order to encourage judges to engage in activities to improve the law, the legal system, and the administration of justice. As a judicial officer and person specially learned in the law, a judge is in a unique position to contribute to the improvement of the law, the legal system, and the administration of justice, including, but not limited to, the improvement of the role of the judiciary as an independent branch of government, the revision of substantive and procedural law, the improvement of criminal and juvenile justice, and the improvement of justice in the areas of civil, criminal, family, domestic violence, juvenile delinquency, juvenile dependency, probate and motor vehicle law. To the extent that time permits, a judge is encouraged to do so, either independently or through a bar association, judicial conference or other organization dedicated to the improvement of the law. Support of pro bono legal services by members of the bench is an activity that relates to improvement of the administration of justice. Accordingly, a judge may engage in activities intended to encourage attorneys to perform pro bono services, including, but not limited to: participating in events to recognize attorneys who do pro bono work, establishing

general procedural or scheduling accommodations for pro bono attorneys as feasible, and acting in an advisory capacity to pro bono programs. Judges are encouraged to participate in efforts to promote the fair administration of justice, the independence of the judiciary and the integrity of the legal profession, which may include the expression of opposition to the persecution of lawyers and judges in other countries.

The phrase "subject to the requirements of this Code" is included to remind judges that the use of permissive language in various sections of the Code does not relieve a judge from the other requirements of the Code that apply to the specific conduct.

Canon 4C. See Canon 2B regarding the obligation to avoid improper influence.

Canon 4D(1). The changing nature of some organizations and of their relationship to the law makes it necessary for a judge regularly to reexamine the activities of each organization with which the judge is affiliated to determine if it is proper for the judge to continue the affiliation. For example, the boards of some legal aid organizations now make policy decisions that may have political significance or imply commitment to causes that may come before the courts for adjudication.

Canon 4D(2). A judge may solicit membership or endorse or encourage membership efforts for an organization devoted to the improvement of the law, the legal system or the administration of justice as long as the solicitation cannot reasonably be perceived as coercive. Personal or direct solicitation of funds for an organization and personal or direct solicitation of memberships involve the danger that the person solicited will feel obligated to respond favorably to the solicitor if the solicitor is in a position of influence or control. A judge must not engage in direct, individual solicitation of funds or memberships in person, in writing or by telephone except in the following cases: 1) a judge may solicit for funds or memberships other judges over whom the judge does not exercise supervisory or appellate authority, 2) a judge may solicit other persons for membership in the organizations described above if neither those persons nor persons with whom they are affiliated are likely ever to appear before the court on which the judge serves and 3) a judge who is an officer of such an organization may send a general membership solicitation mailing over the judge's signature.

A judge may be a speaker or guest of honor at an organization's fund-raising event if the event concerns the law, the legal system, or the administration of justice, and the judge does not engage in the direct solicitation of funds. However, judges may not participate in or allow their titles to be used in connection with fund-raising activities on behalf of an organization engaging in advocacy if such participation

would cast doubt on the judge's capacity to act impartially as a judge.

Use of an organization letterhead for fund-raising or membership solicitation does not violate Canon 4D(2) provided the letterhead lists only the judge's name and office or other position in the organization, and, if comparable designations are listed for other persons, the judge's judicial designation. In addition, a judge must also make reasonable efforts to ensure that the judge's staff, court officials and others subject to the judge's direction and control do not solicit funds on the judge's behalf for any purpose, charitable or otherwise.

[Commentary amended Feb. 20, 2003 (840 So. 2d 1023); May 22, 2008 (983 So. 2d 550).]

Canon 5

A Judge Shall Regulate Extrajudicial Activities to Minimize the Risk of Conflict With Judicial Duties

A. Extrajudicial Activities in General. A judge shall conduct all of the judge's extra-judicial activities so that they do not:

(1) cast reasonable doubt on the judge's capacity to act impartially as a judge;
(2) undermine the judge's independence, integrity, or impartiality;
(3) demean the judicial office;
(4) interfere with the proper performance of judicial duties;
(5) lead to frequent disqualification of the judge; or
(6) appear to a reasonable person to be coercive.

B. Avocational Activities. A judge is encouraged to speak, write, lecture, teach and participate in other extrajudicial activities concerning non-legal subjects, subject to the requirements of this Code.

C. Governmental, Civic or Charitable Activities.

(1) A judge shall not appear at a public hearing before, or otherwise consult with, an executive or legislative body or official except on matters concerning the law, the legal system or the administration of justice or except when acting pro se in a matter involving the judge or the judge's interests.

(2) A judge shall not accept appointment to a governmental committee or commission or other governmental position that is concerned with issues of fact or policy on matters other than the improvement of the law, the legal system, the

judicial branch, or the administration of justice. A judge may, however, represent a country, state or locality on ceremonial occasions or in connection with historical, educational or cultural activities.

(3) A judge may serve as an officer, director, trustee or non-legal advisor of an educational, religious, charitable, fraternal, sororal or civic organization not conducted for profit, subject to the following limitations and the other requirements of this Code.

(a) A judge shall not serve as an officer, director, trustee or non-legal advisor if it is likely that the organization

(i) will be engaged in proceedings that would ordinarily come before the judge, or

(ii) will be engaged frequently in adversary proceedings in the court of which the judge is a member or in any court subject to the appellate jurisdiction of the court of which the judge is a member.

(b) A judge as an officer, director, trustee or non-legal advisor, or as a member or otherwise:

(i) may assist such an organization in planning fund-raising and may participate in the management and investment of the organization's funds, but shall not personally or directly participate in the solicitation of funds, except that a judge may solicit funds from other judges over whom the judge does not exercise supervisory or appellate authority;

(ii) shall not personally or directly participate in membership solicitation if the solicitation might reasonably be perceived as coercive;

(iii) shall not use or permit the use of the prestige of judicial office for fund-raising or membership solicitation.

D. Financial Activities.

(1) A judge shall not engage in financial and business dealings that

(a) may reasonably be perceived to exploit the judge's judicial position, or

(b) involve the judge in frequent transactions or continuing business relationships with those lawyers or other persons likely to come before the court on which the judge serves.

(2) A judge may, subject to the requirements of this Code, hold and manage investments of the judge and members of the judge's family, including real estate, and engage in other remunerative activity.

(3) A judge shall not serve as an officer, director, manager, general partner, advisor or employee of any business entity except that a judge may, subject to the requirements of this Code, manage and participate in:

(a) a business closely held by the judge or members of the judge's family, or

(b) a business entity primarily engaged in investment of the financial resources of the judge or members of the judge's family.

(4) A judge shall manage the judge's investments and other financial interests to minimize the number of cases in which the judge is disqualified. As soon as the judge can do so without serious financial detriment, the judge shall divest himself or herself of investments and other financial interests that might require frequent disqualification.

(5) A judge shall not accept, and shall urge members of the judge's family residing in the judge's household not to accept, a gift, bequest, favor or loan from anyone except for:

(a) a gift incident to a public testimonial, books, tapes and other resource materials supplied by publishers on a complimentary basis for official use, or an invitation to the judge and the judge's spouse or guest to attend a bar-related function or an activity devoted to the improvement of the law, the legal system or the administration of justice, including attending, without charge, a bar-related lunch, dinner, or social event; and if the value of attending an individual function or event exceeds $100, the judge shall report it under Canon 6B(2);

(b) a gift, award or benefit incident to the business, profession or other separate activity of a spouse or other family member of a judge residing in the judge's household, including gifts, awards and benefits for the use of both the spouse or other family member and the judge (as spouse or family member), provided the gift, award or benefit could not reasonably be perceived as intended to influence the judge in the performance of judicial duties;

(c) ordinary social hospitality;

(d) a gift from a relative or friend, for a special occasion, such as a wedding, anniversary or birthday, if the gift is fairly commensurate with the occasion and the

relationship;

(e) a gift, bequest, favor or loan from a relative or close personal friend whose appearance or interest in a case would in any event require disqualification under Canon 3E;

(f) a loan from a lending institution in its regular course of business on the same terms generally available to persons who are not judges;

(g) a scholarship or fellowship awarded on the same terms and based on the same criteria applied to other applicants; or

(h) any other gift, bequest, favor or loan, only if the donor is not a party or other person who has come or is likely to come or whose interests have come or are likely to come before the judge; and, if its value, or the aggregate value in a calendar year of such gifts, bequests, favors, or loans from a single source, exceeds $100.00, the judge reports it in the same manner as the judge reports gifts under Canon 6B(2).

E. Fiduciary Activities.

(1) A judge shall not serve as executor, administrator or other personal representative, trustee, guardian, attorney in fact or other fiduciary, except for the estate, trust or person of a member of the judge's family, and then only if such service will not interfere with the proper performance of judicial duties.

(2) A judge shall not serve as a fiduciary if it is likely that the judge as a fiduciary will be engaged in proceedings that would ordinarily come before the judge, or if the estate, trust or ward becomes involved in adversary proceedings in the court on which the judge serves or one under its appellate jurisdiction.

(3) The same restrictions on financial activities that apply to a judge personally also apply to the judge while acting in a fiduciary capacity.

F. Service as Arbitrator or Mediator.

(1) A judge shall not act as an arbitrator or mediator or otherwise perform judicial functions in a private capacity unless expressly authorized by law or Court rule. A judge may, however, take the necessary educational and training courses required to be a qualified and certified arbitrator or mediator, and may fulfill the requirements of observing and conducting actual arbitration or mediation proceedings as part of the certification process, provided such program does not, in

any way, interfere with the performance of the judge's judicial duties.

(2) A senior judge may serve as a mediator in a case in a circuit in which the senior judge is not presiding as a judge only if the senior judge is certified pursuant to rule 10.100, Florida Rules for Certified and Court-Appointed Mediators. Such senior judge may be associated with entities that are solely engaged in offering mediation or other alternative dispute resolution services but that are not otherwise engaged in the practice of law. However, such senior judge may not advertise, solicit business, associate with a law firm, or participate in any other activity that directly or indirectly promotes his or her mediation, arbitration, or voluntary trial resolution services and shall not permit an entity with which the senior judge associates to do so. A senior judge shall not serve as a mediator, arbitrator, or voluntary trial resolution judge in any case in a circuit in which the judge is currently presiding as a senior judge. A senior judge who provides mediation, arbitration, or voluntary trial resolution services shall not preside over any case in the circuit where such services are provided; however, a senior judge may preside over cases in circuits in which the judge does not provide such dispute-resolution services. A senior judge shall disclose if the judge is being utilized or has been utilized as a mediator, arbitrator, or voluntary trial resolution judge by any party, attorney, or law firm involved in the case pending before the senior judge. Absent express consent of all parties, a senior judge is prohibited from presiding over any case involving any party, attorney, or law firm that is utilizing or has utilized the judge as a mediator, arbitrator, or voluntary trial resolution judge within the previous three years. A senior judge shall disclose any negotiations or agreements for the provision of services as a mediator, arbitrator, or voluntary trial resolution judge between the senior judge and any parties or counsel to the case.

G. Practice of Law. A judge shall not practice law. Notwithstanding this prohibition, a judge may act pro se and may, without compensation, give legal advice to and draft or review documents for a member of the judge's family. [Amended Jan. 10, 2002 (816 So. 2d 1084); Feb. 20, 2003 (840 So. 2d 1023); Nov. 3, 2005, effective Jan. 1, 2006 (915 So. 2d 145); May 22, 2008 (983 So. 2d 550); June 19, 2014 (141 So. 3d 1172); July 7, 2016, effective Oct. 1, 2016 (194 So. 3d 1015); May 18, 2017, effective Jan. 1, 2017 (218 So. 3d 432).]

COMMENTARY

Canon 5A. Complete separation of a judge from extra-judicial activities is neither possible nor wise; a judge should not become isolated from the community in which the judge lives. For that reason, judges are encouraged to participate in extrajudicial community activities.

Expressions of bias or prejudice by a judge, even outside the judge's judicial activities, may cast reasonable doubt on the judge's capacity to act impartially as a judge and may undermine the independence and integrity of the judiciary. Expressions which may do so include jokes or other remarks demeaning individuals on the basis of their race, sex, religion, national origin, disability, age, sexual orientation or socioeconomic status. See Canon 2C and accompanying Commentary.

Canon 5B. In this and other sections of Canon 5, the phrase "subject to the requirements of this Code" is used, notably in connection with a judge's governmental, civic or charitable activities. This phrase is included to remind judges that the use of permissive language in various sections of the Code does not relieve a judge from the other requirements of the Code that apply to the specific conduct.

Canon 5C(1). See Canon 2B regarding the obligation to avoid improper influence.

Canon 5C(2). Canon 5C(2) prohibits a judge from accepting any governmental position except one relating to the law, legal system or administration of justice as authorized by Canon 4D. The appropriateness of accepting extrajudicial assignments must be assessed in light of the demands on judicial resources created by crowded dockets and the need to protect the courts from involvement in extrajudicial matters that may prove to be controversial. Judges should not accept governmental appointments that are likely to interfere with the effectiveness and independence of the judiciary.

Canon 5C(2) does not govern a judge's service in a nongovernmental position. See Canon 5C(3) permitting service by a judge with educational, religious, charitable, fraternal, sororal or civic organizations not conducted for profit. For example, service on the board of a public educational institution, unless it were a law school, would be prohibited under Canon 5C(2), but service on the board of a public law school or any private educational institution would generally be permitted under Canon 5C(3).

Canon 5C(3). Canon 5C(3) does not apply to a judge's service in a governmental position unconnected with the improvement of the law, the legal system or the administration of justice; see Canon 5C(2).

See Commentary to Canon 5B regarding use of the phrase "subject to the following limitations and the other requirements of this Code." As an example of the meaning of the phrase, a judge permitted by Canon 5C(3) to serve on the board

of a fraternal institution may be prohibited from such service by Canons 2C or 5A if the institution practices invidious discrimination or if service on the board otherwise casts reasonable doubt on the judge's capacity to act impartially as a judge.

Service by a judge on behalf of a civic or charitable organization may be governed by other provisions of Canon 5 in addition to Canon 5C. For example, Canon 5G prohibits a judge from serving as a legal advisor to a civic or charitable organization.

Canon 5C(3)(a). The changing nature of some organizations and of their relationship to the law makes it necessary for a judge to regularly reexamine the activities of each organization with which the judge is affiliated in order to determine if it is proper for the judge to continue the affiliation. For example, in many jurisdictions charitable hospitals are now more frequently in court than in the past.

Canon 5C(3)(b). A judge may solicit membership or endorse or encourage membership efforts for a nonprofit educational, religious, charitable, fraternal, sororal or civic organization as long as the solicitation cannot reasonably be perceived as coercive and is not essentially a fund-raising mechanism. Personal or direct solicitation of funds for an organization and personal or direct solicitation of memberships similarly involve the danger that the person solicited will feel obligated to respond favorably to the solicitor if the solicitor is in a position of influence or control. A judge must not engage in direct, individual solicitation of funds or memberships in person, in writing or by telephone except in the following cases: 1) a judge may solicit for funds or memberships other judges over whom the judge does not exercise supervisory or appellate authority, 2) a judge may solicit other persons for membership in the organizations described above if neither those persons nor persons with whom they are affiliated are likely ever to appear before the court on which the judge serves and 3) a judge who is an officer of such an organization may send a general membership solicitation mailing over the judge's signature.

Mere attendance at an event, whether or not the event serves a fund-raising purpose, does not constitute a violation of Canon 5C(3)(b). It is also generally permissible for a judge to pass a collection plate at a place of worship or for a judge to serve as an usher or food server or preparer, or to perform similar subsidiary and unadvertised functions at fund-raising events sponsored by educational, religious, charitable, fraternal, or civic organizations, so long as they do not entail direct or personal solicitation. However, a judge may not be a

speaker, guest of honor, or otherwise be featured at an organization's fund-raising event, unless the event concerns the law, the legal system, or the administration of justice as authorized by Canon 4D(2)(b).

Use of an organization letterhead for fund-raising or membership solicitation does not violate Canon 5C(3)(b) provided the letterhead lists only the judge's name and office or other position in the organization, and, if comparable designations are listed for other persons, the judge's judicial designation. In addition, a judge must also make reasonable efforts to ensure that the judge's staff, court officials and others subject to the judge's direction and control do not solicit funds on the judge's behalf for any purpose, charitable or otherwise.

Canon 5D(1). When a judge acquires in a judicial capacity information, such as material contained in filings with the court, that is not yet generally known, the judge must not use the information for private gain. See Canon 2B; see also Canon 3B(11).

A judge must avoid financial and business dealings that involve the judge in frequent transactions or continuing business relationships with persons likely to come either before the judge personally or before other judges on the judge's court. In addition, a judge should discourage members of the judge's family from engaging in dealings that would reasonably appear to exploit the judge's judicial position. This rule is necessary to avoid creating an appearance of exploitation of office or favoritism and to minimize the potential for disqualification. With respect to affiliation of relatives of the judge with law firms appearing before the judge, see Commentary to Canon 3E(1) relating to disqualification.

Participation by a judge in financial and business dealings is subject to the general prohibitions in Canon 5A against activities that tend to reflect adversely on impartiality, demean the judicial office, or interfere with the proper performance of judicial duties. Such participation is also subject to the general prohibition in Canon 2 against activities involving impropriety or the appearance of impropriety and the prohibition in Canon 2B against the misuse of the prestige of judicial office. In addition, a judge must maintain high standards of conduct in all of the judge's activities, as set forth in Canon 1. See Commentary for Canon 5B regarding use of the phrase "subject to the requirements of this Code."

Canon 5D(2). This Canon provides that, subject to the requirements of this Code, a judge may hold and manage investments owned solely by the judge, investments owned solely by a member or members of the judge's family, and investments owned jointly by the judge and members of the judge's family.

Canon 5D(3). Subject to the requirements of this Code, a judge may participate in a business that is closely held either by the judge alone, by members of the judge's family, or by the judge and members of the judge's family.

Although participation by a judge in a closely-held family business might otherwise be permitted by Canon 5D(3), a judge may be prohibited from participation by other provisions of this Code when, for example, the business entity frequently appears before the judge's court or the participation requires significant time away from judicial duties. Similarly, a judge must avoid participating in a closely-held family business if the judge's participation would involve misuse of the prestige of judicial office.

Canon 5D(5). Canon 5D(5) does not apply to contributions to a judge's campaign for judicial office, a matter governed by Canon 7.

Because a gift, bequest, favor or loan to a member of the judge's family residing in the judge's household might be viewed as intended to influence the judge, a judge must inform those family members of the relevant ethical constraints upon the judge in this regard and discourage those family members from violating them. A judge cannot, however, reasonably be expected to know or control all of the financial or business activities of all family members residing in the judge's household.

Canon 5D(5)(a). Acceptance of an invitation to a law-related function is governed by Canon 5D(5)(a); acceptance of an invitation paid for by an individual lawyer or group of lawyers is governed by Canon 5D(5)(h).

The attendance, without charge, of a bar-related lunch, dinner, or social event such as a reception or Law Day event does not have to be reported under Canon 6B(2), as long as the actual value of attending the individual function or event does not exceed $100, despite the fact that the aggregate value of attending such functions or events given by the same bar association or other entity in the same calendar year exceeds $100. This differs from Rule 3.15 of the American Bar Association Model Code of Judicial Conduct (2011), which requires the reporting of such attendance if the value of attending such functions or events alone or in the aggregate from the same source in the same calendar year exceeds a specified amount.

A judge may accept a public testimonial or a gift incident thereto only if the donor organization is not an organization whose members comprise or frequently represent the same side in litigation, and the testimonial and gift are otherwise in

compliance with other provisions of this Code. See Canons 5A(1) and 2B.

Canon 5D(5)(d). A gift to a judge, or to a member of the judge's family living in the judge's household, that is excessive in value raises questions about the judge's impartiality and the integrity of the judicial office and might require disqualification of the judge where disqualification would not otherwise be required. See, however, Canon 5D(5)(e).

Canon 5D(5)(h). Canon 5D(5)(h) prohibits judges from accepting gifts, favors, bequests or loans from lawyers or their firms if they have come or are likely to come before the judge; it also prohibits gifts, favors, bequests or loans from clients of lawyers or their firms when the clients' interests have come or are likely to come before the judge.

Canon 5E(3). The restrictions imposed by this Canon may conflict with the judge's obligation as a fiduciary. For example, a judge should resign as trustee if detriment to the trust would result from divestiture of holdings the retention of which would place the judge in violation of Canon 5D(4).

Canon 5F(1). Canon 5F(1) does not prohibit a judge from participating in arbitration, mediation or settlement conferences performed as part of judicial duties. An active judge may take the necessary educational and training programs to be certified or qualified as a mediator or arbitrator, but this shall not be a part of the judge's judicial duties. While such a course will allow a judge to have a better understanding of the arbitration and mediation process, the certification and qualification of a judge as a mediator or arbitrator is primarily for the judge's personal benefit. While actually participating in the mediation and arbitration training activities, care must be taken in the selection of both cases and locations so as to guarantee that there is no interference or conflict between the training and the judge's judicial responsibilities. Indeed, the training should be conducted in such a manner as to avoid the involvement of persons likely to appear before the judge in legal proceedings.

Canon 5F(2). The purpose of the admonitions in this canon is to ensure that the impartiality of a senior judge is not subject to question. Although a senior judge may act as a mediator, arbitrator, or voluntary trial resolution judge in a circuit in which the judge is not presiding as a senior judge, attention must be given to relationships with lawyers and law firms which may require disclosure or disqualification. These provisions are intended to prohibit a senior judge from soliciting lawyers to use the senior judge's mediation services when those lawyers are or may be before the judge in proceedings where the senior judge is acting in a

judicial capacity and to require a senior judge to ensure that entities with which the senior judge associates as a mediator abide by the same prohibitions on advertising or promoting the senior judge's mediation service as are imposed on the senior judge.

Canon 5G. This prohibition refers to the practice of law in a representative capacity and not in a pro se capacity. A judge may act for himself or herself in all legal matters, including matters involving litigation and matters involving appearances before or other dealings with legislative and other governmental bodies. However, in so doing, a judge must not abuse the prestige of office to advance the interests of the judge or the judge's family. See Canon 2B.

The Code allows a judge to give legal advice to and draft legal documents for members of the judge's family, so long as the judge receives no compensation. A judge must not, however, act as an advocate or negotiator for a member of the judge's family in a legal matter.

[Commentary amended Feb. 20, 2003 (840 So. 2d 1023); Nov. 3, 2005, effective Jan. 1, 2006 (915 So. 2d 145); May 22, 2008 (983 So. 2d 550); June 19, 2014 (141 So. 3d 1172); July 7, 2016, effective Oct. 1, 2016 (194 So. 3d 1015); May 18, 2017, effective Jan. 1, 2017 (218 So. 3d 432).]

Canon 6

Fiscal Matters of a Judge Shall be Conducted in a Manner That Does Not Give the Appearance of Influence or Impropriety; a Judge Shall Regularly File Public Reports as Required by Article II, Section 8, of the Constitution of Florida, and Shall Publicly Report Gifts, Expense Reimbursements and Payments, and Waivers of Fees or Charges; Additional Financial Information Shall be Filed With the Judicial Qualifications Commission to Ensure Full Financial Disclosure

A. Compensation for Quasi-Judicial and Extrajudicial Services, Reimbursement or Payment of Expenses, and Waiver of Fees or Charges.

A judge may accept compensation, reimbursement, or direct payment of expenses, and a waiver or partial waiver of fees or charges for registration, tuition, and similar items associated with the judge's participation in quasi-judicial and extrajudicial activities permitted by this Code, if the source of such payments, or waiver does not give the appearance of influencing the judge in the performance of judicial duties or otherwise give the appearance of impropriety, subject to the

following restrictions:

(1) Compensation. Compensation shall not exceed a reasonable amount nor shall it exceed what a person who is not a judge would receive for the same activity. Compensation is reportable as income under Canon 6B(1).

(2) Honoraria and Speaking Fees. A judge may accept honoraria and speaking fees that are reasonable and commensurate with the task performed. Honoraria and speaking fees are reportable as income under Canon 6B(1).

(3) Reimbursement or Payment of Expenses, and Waiver of Fees or Charges. Expense reimbursement shall be limited to the actual cost of travel, food, and lodging reasonably incurred by the judge and, where appropriate to the occasion, to the judge's spouse. Any payment in excess of such an amount is compensation and is reportable as income under Canon 6B(1). Reimbursement or direct payment of expenses, and waiver or partial waiver of fees or charges for the judge or the judge's spouse or guest, from sources other than the state or a judicial branch entity as defined in Florida Rule of Judicial Administration 2.420(b)(2), the amount of which alone or in the aggregate with other reimbursements, payments, or waivers received from the same source in the same calendar year exceeds $100, shall be reported under Canon 6B(2).

B. Public Financial Reporting.

(1) Income and Assets. A judge shall file such public report as may be required by law for all public officials to comply fully with the provisions of Article II, Section 8, of the Constitution of Florida. The form for public financial disclosure shall be that recommended or adopted by the Florida Commission on Ethics for use by all public officials. The form shall be filed with the Florida Commission on Ethics on the date prescribed by law, and a copy shall be filed simultaneously with the Judicial Qualifications Commission.

(2) Gifts, Reimbursements or Payments of Expenses, and Waivers of Fees or Charges. A judge shall file a public report of all gifts required to be disclosed under Canons 5D(5)(a) and 5D(5)(h) of the Code of Judicial Conduct, and of all reimbursements or direct payments of expenses, and waivers of fees or charges required to be disclosed under Canon 6A(3). The report of gifts, expense reimbursements or direct payments, and waivers received in the preceding calendar year shall be filed with the Florida Commission on Ethics on or before July 1 of each year. Disclosure shall be made using Form 6A in the commentary below. A copy shall be filed simultaneously with the Judicial Qualifications Commission.

(3) Disclosure of Financial Interests Upon Leaving Office. A judge shall file a final disclosure statement within 60 days after leaving office, which report shall cover the period between January 1 of the year in which the judge leaves office and his or her last day of office, unless, within the 60-day period, the judge takes another public position requiring financial disclosure under Article II, Section 8, of the Constitution of Florida, or is otherwise required to file full and public disclosure for the final disclosure period. The form for disclosure of financial interests upon leaving office shall be that recommended or adopted by the Florida Commission on Ethics for use by all public officials. The form shall be filed with the Florida Commission on Ethics and a copy shall be filed simultaneously with the Judicial Qualifications Commission.

C. Confidential Financial Reporting to the Judicial Qualifications Commission.

To ensure that complete financial information is available for all judicial officers, there shall be filed with the Judicial Qualifications Commission on or before July 1 of each year, if not already included in the public report to be filed under Canon 6B(1) and (2), a verified list of the names of the corporations and other business entities in which the judge has a financial interest as of December 31 of the preceding year, which shall be transmitted in a separate sealed envelope, placed by the Commission in safekeeping, and not be opened or the contents thereof disclosed except in the manner hereinafter provided.

At any time during or after the pendency of a cause, any party may request information as to whether the most recent list filed by the judge or judges before whom the cause is or was pending contains the name of any specific person or corporation or other business entity which is a party to the cause or which has a substantial direct or indirect financial interest in its outcome. Neither the making of the request nor the contents thereof shall be revealed by the chair to any judge or other person except at the instance of the individual making the request. If the request meets the requirements hereinabove set forth, the chair shall render a prompt answer thereto and thereupon return the report to safekeeping for retention in accordance with the provisions hereinabove stated. All such requests shall be verified and transmitted to the chair of the Commission on forms to be approved by it.

D. Limitation of Disclosure.

Disclosure of a judge’s income, debts, investments or other assets is required only to the extent provided in this Canon and in Sections 3E and 3F, or as otherwise required by law.

[Amended Jan. 10, 2002 (816 So. 2d 1084); May 18, 2017, effective Jan. 1, 2017 (218 So. 3d 432); May 10, 2018 (242 So. 3d 319).]

COMMENTARY

Canon 6A. See Section 5D(5)(a)–(h) regarding reporting of gifts, bequests and loans.

The Code does not prohibit a judge from accepting honoraria or speaking fees provided that the compensation is reasonable and commensurate with the task performed. A judge should ensure, however, that no conflicts are created by the arrangement. Judges must not appear to trade on the judicial position for personal advantage. Nor should a judge spend significant time away from court duties to meet speaking or writing commitments for compensation. In addition, the source of the payment must not raise any question of undue influence or the judge's ability or willingness to be impartial.

Canon 6A(3) requires a judge to report expense reimbursements or payments, and fee waivers from sources other than the state or a judicial branch entity, when the amount received alone or combined with other reimbursements, payments, or waivers received from the same source in the same calendar year exceeds $100. Cf. Model Code of Jud. Conduct rs. 3.14(A), 3.15(A)(3) (Am. Bar Ass'n 2011) (requiring the reporting of expense reimbursements and fee waivers from "sources other than the judge's employing entity," when the individual or combined amount received from the same source in a calendar year exceeds a specified amount). The Canon 6A(3) reporting requirement is similar to the reporting requirement for expense reimbursements and waivers in Rule 3.15(A)(3) of the American Bar Association Model Code of Judicial Conduct (2011), in that reimbursements, payments, and waivers must be reported if the amount of reimbursement, payment, or waiver, alone or in the aggregate with other reimbursements, payments, or waivers received from the same source in the same calendar year, exceeds the specified amount of $100. However, unlike the model rule, the amount of a reportable reimbursement, payment, or waiver does not have to be reported on Form 6A. Unlike gifts, the amount of which must be reported on that form, the dates, location, and purpose of the event or activity for which expenses, fees, or charges were reimbursed, paid, or waived must be reported.

Canons 6B and 6C. Subparagraph A prescribes guidelines for additional compensation, reimbursements, or direct payments of expense, and waivers of fees or charges accepted by a judge.

Subparagraphs B and C prescribe the three types of financial disclosure reports required of each judicial officer. The filing of the disclosure reports required under Canon 6B is the only public disclosure of financial interests, compensation, gifts, expense reimbursements, or other benefits that a judge is required to make under this Code or the Florida Constitution. By filing the required disclosure reports, a judge fulfills all the expectations of conduct, and ethical and constitutional requirements related to such disclosure.

The first disclosure report is the Ethics Commission's constitutionally required form pursuant to Article II, Section 8, of the Constitution. It must be filed each year as prescribed by law. The financial reporting period is for the previous calendar year. A final disclosure statement generally is required when a judge leaves office. The filing of the income tax return is a permissible alternative.

The second is a report of gifts, reimbursements or direct payments of expenses, and waivers of fees or charges accepted during the preceding calendar year to be filed publicly with the Florida Commission on Ethics. The gifts to be reported are in accordance with Canons 5D(a) and 5D(5)(h). The expense reimbursements and payments, and waivers to be reported are in accordance with Canon 6A(3). This reporting is in lieu of that prescribed by statute as stated in the Supreme Court's opinion rendered in In re Code of Judicial Conduct, 281 So.2d 21 (Fla.1973). The form for this report is as follows:

Form 6A. Disclosure of Gifts, Expense Reimbursements or Payments, and Waivers of Fees and Charges

All judicial officers must file with the Florida Commission on Ethics a list of all reportable gifts accepted, and reimbursements or direct payments of expenses, and waivers of fees or charges accepted from sources other than the state or a judicial branch entity as defined in Florida Rule of Judicial Administration 2.420(b)(2), during the preceding calendar year as provided in Canons 5D(5)(a), and 5D(5)(h), Canon 6A(3), and Canon 6B(2) of the Code of Judicial Conduct, by date received, description (including dates, location, and purpose of event or activity for which expenses, fees, or charges were reimbursed, paid, or waived), source's name, and amount for gifts only.

Name: _____
Work Telephone: _____
Work Address: _____
Judicial Office Held: _____

1. Please identify all reportable gifts, bequests, favors, or loans you received during the preceding calendar year, as required by Canons 5D(5)(a), 5D(5)(h), and Canon 6B(2) of the Code of Judicial Conduct.

DATE	DESCRIPTION	SOURCE	AMOUNT

□ Check here if continued on separate sheet

2. Please identify all reportable reimbursements or direct payments of expenses, and waivers of fees or charges you received during the preceding calendar year, as required by Canons 6A(3) and 6B(2) of the Code of Judicial Conduct.

DATE	DESCRIPTION (Include dates, location, and purpose of event or activity for which expenses, fees, or charges were reimbursed, paid, or waived)	SOURCE

□ Check here if continued on separate sheet

OATH

State of Florida
County of _____
I, _____, the public official filing this disclosure statement, being first duly sworn, do depose on oath and say that the facts set forth in the above statement are true, correct, and complete to the best of my knowledge and belief.

_____
(Signature of Reporting Official)

_____
(Signature of Officer Authorized to Administer Oaths)

My Commission expires _____.

Sworn to and subscribed before me this

_____ day of _____, 20_____.

COMMENTARY [cont'd]

The third financial disclosure report is prescribed in subparagraph C. This provision ensures that there will be complete financial information for all judicial officers available with the Judicial Qualifications Commission by requiring that full disclosure be filed confidentially with the Judicial Qualifications Commission in the event the limited disclosure alternative is selected under the provisions of Article II, Section 8.

The amendment to this Canon requires in 6B(2) a separate gift report to be filed with the Florida Commission on Ethics on or before July 1 of each year. The form to be used for that report is included in the commentary to Canon 6. It should be noted that Canon 5, as it presently exists, restricts and prohibits the acceptance of certain gifts. This provision is not applicable to other public officials.

With reference to financial disclosure if the judge chooses the limited disclosure alternative available under the provision of Article II, Section 8, of the Constitution of Florida, without the inclusion of the judge's Federal Income Tax Return, then the judge must file with the Commission a list of the names of corporations or other business entities in which the judge has a financial interest even though the amount is less than $1,000. This information remains confidential until a request is made by a party to a cause before the judge. This latter provision continues to ensure that complete financial information for all judicial officers is available with the Judicial Qualifications Commission and that parties who are concerned about a judge's possible financial interest have a means of obtaining that information as it pertains to a particular cause before the judge.

Canon 6D. Section 3E requires a judge to disqualify himself or herself in any proceeding in which the judge has an economic interest. See "economic interest" as explained in the Definitions Section. Canon 5D requires a judge to refrain from engaging in business and from financial activities that might interfere with the impartial performance of judicial duties; Section 6B requires a judge to report all compensation the judge received for activities outside judicial office. A judge has the rights of any other citizen, including the right to privacy of the judge's financial affairs, except to the extent that limitations established by law are required to safeguard the proper performance of the judge's duties.

[Commentary amended Jan. 10, 2002 (816 So. 2d 1084); May 18, 2017, effective Jan. 1, 2017 (218 So. 3d 432); May 10, 2018 (214 So. 3d 319).]

Canon 7

A Judge or Candidate for Judicial Office Shall Refrain From Inappropriate Political Activity

A. All Judges and Candidates.

(1) Except as authorized in Sections 7B(2), 7C(2) and 7C(3), a judge or a candidate for election or appointment to judicial office shall not:

(a) act as a leader or hold an office in a political organization;

(b) publicly endorse or publicly oppose another candidate for public office;

(c) make speeches on behalf of a political organization;

(d) attend political party functions; or

(e) solicit funds for, pay an assessment to or make a contribution to a political organization or candidate, or purchase tickets for political party dinners or other functions.

(2) A judge shall resign from judicial office upon becoming a candidate for a nonjudicial office either in a primary or in a general election, except that the judge may continue to hold judicial office while being a candidate for election to or serving as a delegate in a state constitutional convention if the judge is otherwise permitted by law to do so.

(3) A candidate for a judicial office:

(a) shall be faithful to the law and maintain professional competence in it, and shall not be swayed by partisan interests, public clamor, or fear of criticism;

(b) shall maintain the dignity appropriate to judicial office and act in a manner consistent with the impartiality, integrity, and independence of the judiciary, and shall encourage members of the candidate's family to adhere to the same standards of political conduct in support of the candidate as apply to the candidate;

(c) shall prohibit employees and officials who serve at the pleasure of the candidate, and shall discourage other employees and officials subject to the

candidate's direction and control from doing on the candidate's behalf what the candidate is prohibited from doing under the Sections of this Canon;

(d) except to the extent permitted by Section 7C(1), shall not authorize or knowingly permit any other person to do for the candidate what the candidate is prohibited from doing under the Sections of this Canon;

(e) shall not:

(i) with respect to parties or classes of parties, cases, controversies, or issues that are likely to come before the court, make pledges, promises, or commitments that are inconsistent with the impartial performance of the adjudicative duties of the office; [~~or~~]

(ii) knowingly misrepresent the identity, qualifications, present position or other fact concerning the candidate or an opponent;

(iii) while a proceeding is pending or impending in any court, make any public comment that might reasonably be expected to affect its outcome or impair its fairness or make any nonpublic comment that might substantially interfere with a fair trial or hearing. This section does not apply to proceedings in which the judicial candidate is a litigant in a personal capacity[; or]

(iv) commend or criticize jurors for their verdict other than in a court pleading, filing or hearing in which the candidate represents a party in the proceeding in which the verdict was rendered.

(f) may respond to personal attacks or attacks on the candidate's record as long as the response does not violate Section 7A(3)(e).

B. Candidates Seeking Appointment to Judicial or Other Governmental Office.

(1) A candidate for appointment to judicial office or a judge seeking other governmental office shall not solicit or accept funds, personally or through a committee or otherwise, to support his or her candidacy.

(2) A candidate for appointment to judicial office or a judge seeking other governmental office shall not engage in any political activity to secure the appointment except that:

(a) such persons may:

(i) communicate with the appointing authority, including any selection or

nominating commission or other agency designated to screen candidates;

(ii) seek support or endorsement for the appointment from organizations that regularly make recommendations for reappointment or appointment to the office, and from individuals; and

(iii) provide to those specified in Sections 7B(2)(a)(i) and 7B(2)(a)(ii) information as to his or her qualifications for the office;

(b) a non-judge candidate for appointment to judicial office may, in addition, unless otherwise prohibited by law:

(i) retain an office in a political organization,

(ii) attend political gatherings, and

(iii) continue to pay ordinary assessments and ordinary contributions to a political organization or candidate and purchase tickets for political party dinners or other functions.

C. Judges and Candidates Subject to Public Election.

(1) A candidate, including an incumbent judge, for a judicial office that is filled by public election between competing candidates shall not personally solicit campaign funds, or solicit attorneys for publicly stated support, but may establish committees of responsible persons to secure and manage the expenditure of funds for the candidate's campaign and to obtain public statements of support for his or her candidacy. Such committees are not prohibited from soliciting campaign contributions and public support from any person or corporation authorized by law. A candidate shall not use or permit the use of campaign contributions for the private benefit of the candidate or members of the candidate's family.

(2) A candidate for merit retention in office may conduct only limited campaign activities until such time as the judge certifies that the judge's candidacy has drawn active opposition. Limited campaign activities shall only include the conduct authorized by subsection C(1), interviews with reporters and editors of the print, audio and visual media, and appearances and speaking engagements before public gatherings and organizations. Upon mailing a certificate in writing to the Secretary of State, Division of Elections, with a copy to the Judicial Qualifications Commission, that the judge's candidacy has drawn active opposition, and specifying the nature thereof, a judge may thereafter campaign in any manner authorized by law, subject to the restrictions of subsection A(3). This includes

candidates facing active opposition in a merit retention election for the same judicial office campaigning together and conducting a joint campaign designed to educate the public on merit retention and each candidate's views as to why he or she should be retained in office, to the extent not otherwise prohibited by Florida law.

(3) A judicial candidate involved in an election or re-election, or a merit retention candidate who has certified that he or she has active opposition, may attend a political party function to speak in behalf of his or her candidacy or on a matter that relates to the law, the improvement of the legal system, or the administration of justice. The function must not be a fund raiser, and the invitation to speak must also include the other candidates, if any, for that office. The candidate should refrain from commenting on the candidate's affiliation with any political party or other candidate, and should avoid expressing a position on any political issue. A judicial candidate attending a political party function must avoid conduct that suggests or appears to suggest support of or opposition to a political party, a political issue, or another candidate. Conduct limited to that described above does not constitute participation in a partisan political party activity.

D. Incumbent Judges. A judge shall not engage in any political activity except (i) as authorized under any other Section of this Code, (ii) on behalf of measures to improve the law, the legal system or the administration of justice, or (iii) as expressly authorized by law.

E. Applicability. Canon 7 generally applies to all incumbent judges and judicial candidates. A successful candidate, whether or not an incumbent, is subject to judicial discipline for his or her campaign conduct; an unsuccessful candidate who is a lawyer is subject to lawyer discipline for his or her campaign conduct. A lawyer who is a candidate for judicial office is subject to Rule 4-8.2(b) of the Rules Regulating The Florida Bar.

F. Statement of Candidate for Judicial Office. Each candidate for a judicial office, including an incumbent judge, shall file a statement with the qualifying officer within 10 days after filing the appointment of campaign treasurer and designation of campaign depository, stating that the candidate has read and understands the requirements of the Florida Code of Judicial Conduct. Such statement shall be in substantially the following form:

STATEMENT OF CANDIDATE FOR JUDICIAL OFFICE

I, _____, the judicial candidate, have received, have read,

and understand the requirements of the Florida Code of Judicial Conduct.

_____Signature of Candidate_____

_____Date_____

[Amended Aug. 24, 1995 (659 So. 2d 692); May 30, 1996 (675 So. 2d 111); Nov. 12, 1998 (720 So. 2d 1079); March 10, 2005 (897 So. 2d 1262); Jan. 5, 2006 (918 So. 2d 949); July 3, 2008 (985 So. 2d 1073); June 11, 2015 (167 So. 3d 399).

COMMENTARY

Canon 7A(1). A judge or candidate for judicial office retains the right to participate in the political process as a voter.

Where false information concerning a judicial candidate is made public, a judge or another judicial candidate having knowledge of the facts is not prohibited by Section 7A(1) from making the facts public.

Section 7A(1)(a) does not prohibit a candidate for elective judicial office from retaining during candidacy a public office such as county prosecutor, which is not "an office in a political organization."

Section 7A(1)(b) does not prohibit a judge or judicial candidate from privately expressing his or her views on judicial candidates or other candidates for public office.

A candidate does not publicly endorse another candidate for public office by having that candidate's name on the same ticket.

Section 7A(1)(b) prohibits judges and judicial candidates from publicly endorsing or opposing candidates for public office to prevent them from abusing the prestige of judicial office to advance the interests of others. Section 7C(2) authorizes candidates facing active opposition in a merit retention election for the same judicial office to campaign together and conduct a joint campaign designed to educate the public on merit retention and each candidate's views as to why he or she should be retained in office, to the extent not otherwise prohibited by Florida law. Joint campaigning by merit retention candidates, as authorized under Section 7C(2), is not a prohibited public endorsement of another candidate under Section 7A(1)(b).

Canon 7A(3)(b). Although a judicial candidate must encourage members of his or

her family to adhere to the same standards of political conduct in support of the candidate that apply to the candidate, family members are free to participate in other political activity.

Canon 7A(3)(e). Section 7A(3)(e) prohibits a candidate for judicial office from making statements that commit the candidate regarding cases, controversies or issues likely to come before the court. As a corollary, a candidate should emphasize in any public statement the candidate's duty to uphold the law regardless of his or her personal views. Section 7A(3)(e) does not prohibit a candidate from making pledges or promises respecting improvements in court administration. Nor does this Section prohibit an incumbent judge from making private statements to other judges or court personnel in the performance of judicial duties. This Section applies to any statement made in the process of securing judicial office, such as statements to commissions charged with judicial selection and tenure and legislative bodies confirming appointment.

Canon 7B(2). Section 7B(2) provides a limited exception to the restrictions imposed by Sections 7A(1) and 7D. Under Section 7B(2), candidates seeking reappointment to the same judicial office or appointment to another judicial office or other governmental office may apply for the appointment and seek appropriate support.

Although under Section 7B(2) non-judge candidates seeking appointment to judicial office are permitted during candidacy to retain office in a political organization, attend political gatherings and pay ordinary dues and assessments, they remain subject to other provisions of this Code during candidacy. See Sections 7B(1), 7B(2)(a), 7E and Application Section.

Canon 7C. The term "limited campaign activities" is not intended to permit the use of common forms of campaign advertisement which include, but are not limited to, billboards, bumperstickers, media commercials, newspaper advertisements, signs, etc. Informational brochures about the merit retention system, the law, the legal system or the administration of justice, and neutral, factual biographical sketches of the candidates do not violate this provision.

Active opposition is difficult to define but is intended to include any form of organized public opposition or an unfavorable vote on a bar poll. Any political activity engaged in by members of a judge's family should be conducted in the name of the individual family member, entirely independent of the judge and without reference to the judge or to the judge's office.

Canon 7D. Neither Section 7D nor any other section of the Code prohibits a judge in the exercise of administrative functions from engaging in planning and other official activities with members of the executive and legislative branches of government. With respect to a judge's activity on behalf of measures to improve the law, the legal system and the administration of justice, see Commentary to Section 4B and Section 4C and its Commentary.

[Commentary amended Aug. 24, 1995 (659 So. 2d 692); March 10, 2005 (897 So. 2d 1262); Jan. 5, 2006 (918 So. 2d 949); July 3, 2008 (985 So. 2d 1073); June 11, 2015 (167 So. 3d 399).]

Application

This Code applies to justices of the Supreme Court and judges of the District Courts of Appeal, Circuit Courts, and County Courts.

Anyone, whether or not a lawyer, who performs judicial functions, including but not limited to a civil traffic infraction hearing officer, court commissioner, general or special magistrate, domestic relations commissioner, child support hearing officer, or judge of compensation claims, shall, while performing judicial functions, conform with Canons 1, 2A, and 3, and such other provisions of this Code that might reasonably be applicable depending on the nature of the judicial function performed.

Any judge responsible for a person who performs a judicial function should require compliance with the applicable provisions of this Code.

If the hiring or appointing authority for persons who perform a judicial function is not a judge then that authority should adopt the applicable provisions of this Code.

A. Civil Traffic Infraction Hearing Officer

A civil traffic infraction hearing officer:
(1) is not required to comply with Section 5C(2), 5D(2) and (3), 5E, 5F, and 5G, and Sections 6B and 6C.
(2) should not practice law in the civil or criminal traffic court in any county in which the civil traffic infraction hearing officer presides.

B. Retired/Senior Judge

(1) A retired judge eligible to serve on assignment to temporary judicial duty, hereinafter referred to as "senior judge," shall comply with all the provisions of this Code except Sections 5C(2), 5E, 5F(1), and 6A. A senior judge shall not practice law or serve as a mediator, arbitrator, or voluntary trial resolution judge in a circuit in which the judge is presiding as a senior judge, and shall refrain from accepting any assignment in any cause in which the judge's present financial business dealings, investments, or other extra-judicial activities might be directly or indirectly affected.

(2) If a retired justice or judge does not desire to be assigned to judicial service, such justice or judge who is a member of The Florida Bar may engage in the practice of law and still be entitled to receive retirement compensation. The justice

or judge shall then be entitled to all the rights of an attorney-at-law and no longer be subject to this Code.

[Amended Nov. 3, 2005, effective Jan. 1, 2006 (915 So. 2d 145); Jan. 5, 2006 (918 So. 2d 949); June 19, 2014 (141 So. 3d 1172); July 7, 2016, effective Oct. 1, 2016 (194 So. 3d 1015).]

COMMENTARY

Section A. Please see *In re Florida Rules of Practice and Procedure for Traffic Courts—Civil Traffic Infraction Hearing Officer Pilot Program*, 559 So.2d 1101 (Fla.1990), regarding civil traffic infraction hearing officers.

[Commentary amended Nov. 3, 2005, effective Jan. 1, 2006 (915 So. 2d 145); Jan. 5, 2006 (918 So. 2d 949).]

Effective Date of Compliance

A person to whom this Code becomes applicable shall comply immediately with all provisions of this Code except Sections 5D(2), 5D(3) and 5E and shall comply with these Sections as soon as reasonably possible and shall do so in any event within the period of one year.

COMMENTARY

If serving as a fiduciary when selected as judge, a new judge may, notwithstanding the prohibitions in Section 5E, continue to serve as fiduciary but only for that period of time necessary to avoid serious adverse consequences to the beneficiary of the fiduciary relationship and in no event longer than one year. Similarly, if engaged at the time of judicial selection in a business activity, a new judge may, notwithstanding the prohibitions in Section 5D(3), continue in that activity for a reasonable period but in no event longer than one year.

Appendix IV

Ethics for Court Personnel

ETHICS FOR COURT PERSONNEL

What We Know About the Application
of the Canons to Judicial Staff

The Code of Judicial Conduct makes only eight references, direct or indirect, to judicial staff or other persons who may be authorized to carry out certain responsibilities for a judge or who are subject to a judge's direction and control. The following outline attempts to capture as succinctly as possible what we can know with certainty about the Code's application to judicial staff.

I. Canon 2 – Avoidance of Impropriety: Advancement of Private Interests and Improper Use of Influence

2B: Judges are not permitted to lend the prestige of office to advance their own private interests or the private interests of others.

This canon also prohibits a judge from conveying or permitting others to convey the impression that they are in a special position to influence the judge.

Discussion:

Judges can be disciplined if their staff do something to suggest that by virtue of their position they can lend the prestige of the judge's office to help someone obtain an advantage or can exercise their special position to influence the judge. Although the Application section of the Code does not apply to a judge's staff, and therefore the Judicial Qualifications Commission (JQC) does not have jurisdiction over them, they could face dismissal for a violation if they jeopardize the judge with the JQC. A staff member who is an attorney may also be subject to discipline by The Florida Bar for engaging in conduct involving dishonesty, fraud, deceit, or misrepresentation and for conduct prejudicial to the administration of justice. Rule 4-8.4, Rules Regulating The Florida Bar. See also rule 4-8.4(f), which expressly proscribes an attorney's knowingly assisting a judge in conduct that violates the canons or other law.

II. Canon 3 – Impartiality and Diligence: Dignity and Courtesy

3B(4): "A judge shall be patient, dignified, and courteous to litigants, jurors, witnesses, lawyers, and others with whom the judge deals in an official capacity, and shall require similar conduct of lawyers, and of staff, court officials, and others subject to the judge's direction and control."

This canon requires the judge to mandate "similar conduct" of staff.

Discussion:

One can argue that a judge may be subject to discipline for failure to control, discipline, or possibly dismiss staff members over whom the judge has authority who are impatient, undignified, or discourteous to litigants, attorneys, etc., with whom they come into contact. Court staff represent the court in its administrative capacity when at work, on duty, and acting under a judge's supervision and control. Any undignified or rude act on their part reflects poorly on the court. For attorneys, such conduct may fall under the catch-all rule 4-8.4 as egregious conduct that could be prejudicial to the administration of justice.

III. Canon 3 – Impartiality and Diligence: Manifestations of Bias or Prejudice

3B(5): Judges must perform judicial duties without bias or prejudice. This means that they cannot, in the performance of their judicial duties, by words or conduct manifest bias or prejudice based on "race, sex, religion, national origin, disability, age, sexual orientation, or socioeconomic status."

Judges also cannot permit staff, court officials, and others subject to their direction and control to engage in such conduct. Moreover, Canon 3D(2)**,** under the heading "Disciplinary Responsibilities," provides in pertinent part:

> (2) A judge who receives information or has actual knowledge that substantial likelihood exists that a lawyer has committed a violation of the Rules Regulating The Florida Bar shall take appropriate action.

Discussion:

The commentary to 3D states that "Appropriate action may include direct communication with the . . . lawyer . . . , other direct action if available, or reporting the violation to the appropriate authority or other agency" or body. If the

conduct engaged in by the lawyer "raises a substantial question as to the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects," then the judge is required to report the lawyer to the appropriate authority; i.e., The Florida Bar's Department of Lawyer Regulation. Judges, therefore, have the authority, and sometimes the affirmative duty, to discipline or discharge staff for a bias manifestation. In addition, the above quoted matter from Canon 3D is relevant because rule 4-8.4(d), Rules Regulating The Florida Bar, is the Bar's anti-bias provision, approved by the Florida Supreme Court in *The Florida Bar Re: Amendments to Rules Regulating The Florida Bar*, 624 So. 2d 720 (Fla. 1993). This decision actually predates the anti-bias provision in the canons and requires discipline for lawyers who manifest bias in connection with the practice of law. So, not only might judges discipline or dismiss lawyer employees for a bias manifestation, they might also be required to report them to The Florida Bar, which could ultimately result in suspension or revocation of their license to practice.

There is, of course, an argument to be made that the Bar rule pertains only to "conduct in connection with the practice of law" and that serving as a law clerk is not the "practice" of law. *See* Fla. R. Jud. Admin. 2.505(b) (anyone serving as a staff attorney, law clerk, or judicial assistant to a judge or justice is not permitted to "practice as an attorney"). This is not, however, an argument most would want to make in defending against a discipline complaint, especially in light of the more general language in rule 4-8.4 on conduct prejudicial to the administration of justice.

IV. Canon 3 – Impartiality and Diligence: Public Comment about Pending or Impending Matters

> **3B(9):** Judges must abstain, while a proceeding is pending or impending in any court, from public comment that might reasonably be expected to affect its outcome or impair its fairness, or make any nonpublic comment that might substantially interfere with a fair trial or hearing.
>
> Judges are required to prohibit "court personnel" subject to their "direction and control" from violating this public comment rule.

Discussion:

Canon 3B pertains specifically to judicial performance of adjudicative responsibilities. It also addresses supervisory responsibilities of the judge in this context. Court staff who make a public comment about a pending or impending matter in any court risk subjecting their judge to criticism and/or discipline if that

comment might reasonably be expected to affect the outcome or impair the fairness of the matter. Is this limit on free speech rights constitutional? Probably. *See Pickering v. Board of Ed. of Tp. High School Dist. 205, Will County, Illinois*, 391 U.S. 563, 88 S.Ct. 1731, 20 L.Ed.2d 811 (1968); *Board of Regents of State v. Snyder*, 826 So. 2d 382 (Fla. 2d DCA 2002); *see also Republican Party of Minnesota v. White*, 536 U.S. 765, 122 S.Ct. 2528, 153 L.Ed.2d 694 (2002) (discussed below in the context of Canon 7 and political speech. Although this case is frequently cited as support for extending the bounds of judicial free speech, its likely effect in Florida is more circumscribed and will have less impact here than in some other states. *White* concerned only the constitutionality of Minnesota's "announce clause," completely prohibiting judges from announcing views on disputed legal or political issues. Florida has no "announce clause," having amended the Code a number of years ago to eliminate it. In Florida judges are not entirely prohibited from expressing their views on controversial subjects, but still may not, while a proceeding is pending or impending in any court, make any public comment that might reasonably be expected to affect its outcome or impair its fairness, Canon 3B(9)). *See generally* D'Alemberte, *Searching for the Limits of Judicial Free Speech*, 61 Tulane L. Rev. 611, 614–620, discussing sanctions on speech as disfavored generally, but citing United States Supreme Court authority finding valid reasons for holding judges to a stricter standard; this is not a recent article, but it is well reasoned, and the rationale for limiting judicial comment seems equally persuasive with regard to placing some valid time, place, and manner restrictions on court staff as well.

V. Canon 3 – Impartiality and Diligence: Fidelity and Discharge of Duties

> **3C(1):** A judge must diligently discharge administrative responsibilities without bias or prejudice and maintain professional competence in judicial administration.
>
> **3C(2):** A judge must also require staff to observe the same standards of fidelity and diligence that apply to the judge and to refrain from manifesting bias or prejudice in performing their official duties.

Discussion:

Canon 3C, entitled "Administrative Responsibilities," concerns the judge's obligation to maintain professional competence and diligently discharge duties. In performing administrative responsibilities, the judge has a concomitant supervisory responsibility role as well. Generally speaking, the "standards of fidelity and diligence" by extension apply to staff and refer to maintaining professional

competence, completing projects thoroughly and promptly, and abiding by professional ethics codes that apply to staff. *See* Opinion 97-03 (wherein JEAC opined that under Canon 3C(2), "Although the responsibility in this particular Canon is placed upon the judge, the Committee believes that a law clerk who willfully or negligently violates an applicable standard of fidelity or diligence is guilty of a transgression by acting in such a way as to thwart the judge's opportunity to exercise supervision"). Further, it should be noted that while there may be some "academic" debate about the direct application of the Code of Judicial Conduct to non-judge court staff, at least one court has concluded that a law clerk does possess duties under the canons. *See In re Corrugated Container Antitrust Litigation*, 614 F.2d 958, 968 (5th Cir. 1980) ("In giving an interview with the press, the clerk most likely breached duties imposed upon her by Canons 3 A(6) . . . and 3 B(2) . . . of the Code of Judicial Conduct for United States Judges").

VI. Canon 4 – Activities to Improve the Law, the Legal System, or the Administration of Justice: Fund-raising and Member Solicitation

4D(2)(a) & (d): A judge serving as a member, office, director, trustee, or non-legal advisor to an organization or governmental entity devoted to the improvement of the law, the legal system, the judicial branch, or the administration of justice may not personally or directly participate in the solicitation of funds or other fund-raising activities, and shall not personally or directly participate in membership solicitation if it might reasonably be perceived as coercive, except that the judge may solicit funds from other judges over whom he or she exercises no supervisory or appellate authority.

4D(2)(e): A judge may not use court staff or other court resources for fund-raising purposes unless incidental to activities that concern the law, the legal system, or the administration of justice.

Discussion:

The provisions in Canon 4D(2)(a) and (2)(d) are, arguably, not references to staff at all, and Canon 4D(2)(d) is probably aimed more at preventing other members of the organization or governmental entity with which a judge may have an affiliation from invoking the judge's name in connection with fund-raising or membership solicitation. Still, Canon 4D(2)(e) does refer to court staff, and the commentary to Canon 4D(2) states in pertinent part:

> In addition, a judge must also make reasonable efforts to ensure that the

judge's staff, court officials and others subject to the judge's direction and control do not solicit funds on the judge's behalf for any purpose, charitable or otherwise.

Also, it is worthy of note that Canon 4 addresses not only fund-raising, but also activities and service to improve the law, the legal system, and the administration of justice. Moreover, on an affirmative note, in 2003, the Florida Supreme Court amended Canon 4 to clarify that judges in Florida are not only allowed, but actually encouraged, to participate in activities to improve the law, the legal system, and the administration of justice. The Court has recognized such service as intrinsically good. Outlines frequently focus on the "shalt nots," the negative prohibitions, and it is important to recognize the affirmative aspects as well. However, the rules regarding funds solicitation are just as restrictive as ever.

Please see the following discussion of Canon 5 and Opinion 93-45 for further discussion of related issues, such as involvement in activities to improve the law, the legal system, or the administration of justice and Canon 5 charitable and civic involvement.

VII. Canon 5 – Extrajudicial Activity: Fund-raising and Member Solicitation – Charitable and Civic

5C(3)(b)(i) & (ii): A judge cannot solicit funds for any educational, religious, charitable, fraternal, or civic organization except from other judges over whom the judge does not exercise supervisory or appellate authority, and cannot participate in membership solicitation for such organizations if it might reasonably be perceived as coercive.

5C(3)(b)(iii): A judge must not permit the use of the prestige of judicial office for fund-raising or membership solicitation.

Discussion:

These references, like certain of the preceding references in Canon 4, are only indirectly related to law clerks and other court staff and do not mention court personnel at all. The references to "permitting" the use of the prestige of office are clear enough, though. Staff cannot do for the judge what the judge may not do directly.

Does this mean that court staff may not solicit funds for an educational, religious charitable, fraternal, or civic organization? They probably can, within some important limitations. They may not act as the judge's representative, but they may

not be prohibited from involvement in charity work, including fund-raising, on their own time. They also should conduct the activity independently of the judge, without reference to the judge or the judge's office. Court letterhead should never be used, and there is no reason to mention the particular court position held. It is strongly recommended that staff avoid soliciting support for such an organization any time on court premises, even if to do so would not interfere with the performance of work duties. The appearance of impropriety would be too great as a judge's staff are identified in connection with the judge while on premises. The key is to not be perceived as engaging in the activity on the judge's behalf. *See* Opinion 93-45. (This opinion refers to partisan political activity by judicial staff, but provides an instructive analogy to their civic and "extra-curricular activities." The opinion suggests that within valid time/place/manner restrictions, staff may engage in political activity completely unconnected from the court. This is probably true of civic or charitable activities as well.)

VIII. Canon 7 – Political Activity: Involvement of Court Staff

7A(1): "Except as authorized in Sections 7B(2), 7C(2) and 7C(3), a judge or candidate for election or appointment to judicial office shall not:

(a) act as a leader or hold an office in a political organization;

(b) publicly endorse or publicly oppose another candidate for public office;

(c) make speeches on behalf of a political organization;

(d) attend political party functions; or

(e) solicit funds for, pay an assessment to or make a contribution to a political organization or candidate, or purchase tickets for political party dinners or other functions."

7A(3)(c): The judge must prohibit "employees and officials who serve at the pleasure of the candidate, and shall discourage other employees and officials subject to the candidate's direction and control from doing on the candidate's behalf what the candidate is prohibited from doing under the Sections of this Canon."

7A(3)(d): This section, with limited exceptions for campaign committees, also places a responsibility on the judge not to permit "any other person" to do for the judge what he or she may not do as a candidate.

> **7C(1):** A judge cannot, during his or her own campaign, personally solicit campaign funds or solicit attorneys for publicly stated support, but may establish a committee to do so.
>
> **7D:** "A judge shall not engage in any political activity except (i) as authorized under any other Section of this Code, (ii) on behalf of measures to improve the law, the legal system or the administration of justice, or (iii) as expressly authorized by law."

Discussion:

Canon sections 7A and 7D refer to political activity anytime, and Canon 7C refers to campaign conduct specifically. In the past, before the 1994 revisions to the Code of Judicial Conduct, the committee interpreted Canon 7 to mean that employees could not engage in any activity prohibited by Canon 7 as a whole, at least while the employing judge was in the midst of a campaign between competing candidates or on the basis of merit retention. Opinion 93-45, issued before the 1994 revisions to Canon 7, clarified the matter somewhat.

The Florida Supreme Court has expressed that court staff may engage "in partisan political activity during personal time, provided such activity is conducted entirely independent of the judge and without reference to the judge o[r] judge's office." Supreme Court Conference Minutes of September 8, 1992, as cited in Opinion 93-45.

In Opinion 93-45, analogy was drawn to members of a judge's family, who are specifically mentioned in the Canon 7 commentary as having the right to participate in the political process. Similarly, the current commentary to Canon 7A(3)(b) states, "Although a judicial candidate must encourage members of his or her family to adhere to the same standards of political conduct in support of the candidate that apply to the candidate, family members are free to participate in other political activity."

Under the current Canon 7, court staff, like family members, may, in the committee's opinion, safely participate in "other political activity" subject to the caveats that appear in Opinion 93-45.

More recently the United States Supreme Court addressed the bounds of judicial free speech limits for judges in a political context, and this opinion too may have implications for non-judge staff. In *Republican Party of Minnesota v. White*, 536 U.S. 765, 122 S.Ct. 2528, 153 L.Ed.2d 694 (2002), the Court in a 5-4 decision held

unconstitutional the so-called "announce clause" of Minnesota's Code of Judicial Conduct, which prohibited judicial candidates from announcing views on disputed legal or political issues. In the majority opinion, Justice Scalia observed that the text of the Minnesota announce clause as written prohibited a candidate's "mere statement of his current position, even if he does not bind himself to maintain that position after election." *Id.* at 770. Rejecting the state's argument that the announce clause served the compelling interest of preserving the impartiality and appearance of impartiality of the state's judiciary, Justice Scalia noted that the parties and the courts below left the term "impartiality" undefined and that a definition was "essential" to properly conducting a strict-scrutiny analysis. *Id.* at 775. The majority opinion discusses three possible definitions of impartiality, and then holds that under any definition of the term "impartiality," the announce clause failed strict scrutiny and was unconstitutional. *Id.* at 775–784. *See generally* Matthew J. Medina, *The Constitutionality of the 2003 Revisions to Canon 3(E) of the Model Code of Judicial Conduct*, 104 Colum. L. Rev. 1072 (2004).

White involved a challenge only to the announce clause, and the Court explicitly limited its holding to that provision. *Id.* at 773 n.5. Nevertheless, will the First Amendment principles announced in *White* apply to the Canon 7A limitations on political activity? The Florida Supreme Court in *In re Kinsey*, 842 So. 2d 77, 86-89 (Fla. 2003), held *White* inapplicable to Florida's Code of Judicial Conduct, reasoning that Florida had previously adopted a narrowly tailored promises and commitments clause. The New York Court of Appeals similarly found *White* distinguishable on challenges to portions of New York's code. *See In re Watson*, 794 N.E.2d 1, 6–7 (N.Y. 2003) (distinguishing case from *White* as "political activity" at issue related to improper contribution to political party, not announcement of political views); *In re Raab*, 793 N.E.2d 1287, 1290, 1293 (N.Y. 2003) (distinguishing *White* and holding that it did not compel result in challenge to promises clause). How or whether *White* has any impact in Florida or represents an expansion of the speech rights of judges, law clerks, or other non-judge court staff is not absolutely certain. Clearly, staff should not make any promises or commitments about how they will do their jobs or attempt to wield influence, and that would be true with or without the *White* decision. It would also be unwise to assume that *White* stands for the broad proposition that because judges may not be prevented from announcing their views on some controversial issues, appellate court staff can now speak their minds frankly in any forum at any time.

In addition to the canons and the case law, there are also some useful caveats in Section 5.03 of the State Courts System's Personnel Regulations Manual that apply to all state courts system employees, summarized as follows:

1. An employee shall not use regular working hours to conduct activities associated with a political campaign.

2. No resources of the State Courts System may be used by an employee for campaign purposes.

3. No employee shall use the authority of his or her position to secure support for or oppose a candidate, party, or issue in a partisan election.

4. No employee shall hold or be a candidate for public or political office while in the employment of the state unless authorized by the employing chief judge or chief justice, and the office must involve "no interest which conflicts or interferes with his or her court employment."

5. "The employee may not solicit or accept campaign contributions from persons or entities who are regulated by or are doing business with the court, or whose interests have come, or are likely to come before the court in a case or controversy."

   (Note: While the Personnel Regulation actually deals with State Courts System employees who want to run for public office while employed by the State Courts System, it contains useful analogies to State Courts System employees who merely want to be politically active. With regard to the question whether a law clerk may run for public office while employed, there is sparse authority. *See* Opinion 00-33. In order to do so however, the law clerk will need the permission of the chief justice, his or her chief judge, and the judge for whom the clerk serves as personal staff. The law clerk will also need to satisfy the judges that the political campaign will not interfere with the employee's work responsibilities and that it will not create any conflicts of interest in the performance of job duties. It is the author's opinion that this is a very difficult burden for a law clerk or other judicial branch attorney to meet. In Opinion 00-33, JEAC observed that Canon 3C(4) does not expressly prohibit a judge from hiring an elected city council member as a staff attorney, but a majority noticed that an elected city council member is "on duty" all the time and that the hiring would, in the opinion of most committee members, be "rife with the appearance of impropriety." With regard to community activities that may have political overtones, in Opinion

01-12, really a Canon 4-related opinion, the committee expressed the opinion that a law clerk could serve on the Board of Directors of Florida Legal Services, if the entity acts only as an administrative body to assign cases and does not make policy decisions of political significance or that may imply commitment to causes that might come before the court to adjudicate. This opinion illustrates how much more difficult it would be to comply if one is an elected official. The application of this opinion to staff other than law clerks is uncertain because it has not been addressed. Law clerks assist judges in their adjudicative role.)

Tab Z – Prima Facie VBM Violations Memorandum: Establishes statutory violations and presumption of illegality under *Boardman* and *Thornburg*.

IN THE SUPREME COURT OF FLORIDA

Case No.: SC2025-1102
DCA CASE NOS.: 2D2024-2687, 2D2024-2688
LT CASE NOS.: 24-003717-CI; 24-003995-CI

CHRISTOPHER GLEASON,
Petitioner,

v.

SECOND DISTRICT COURT OF APPEAL, et al.,

Respondents.
_____/

Petitioner's Supporting Memorandum on Prima Facie Statutory Violations

(Sunday June 23, 2024 & September 9, 2024 VBM Requests)

Filed in Support of AMENDED PETITION FOR WRIT OF PROHIBITION AND ALL-WRITS RELIEF

Introductory Statement

This Supporting Memorandum addresses the legal significance of two large-scale batches of vote-by-mail (VBM) requests entered into the Florida Voter Registration System (FVRS) on Sunday June 23, 2024 and 196,037 again on September 9, 2024. Official records indicate that all 219,673 requests from Sunday June 23, 2024, and the subsequent batch of 196,037 on September 9, 2024 were flagged “N/N” for lack of required identification verification.

Because Florida law mandates strict compliance with statutory requirements governing VBM requests, these unrebutted entries constitute prima facie evidence of statutory violations, official misconduct, and felony-level election crimes.

Prima Facie Statutory Violations – Sunday June 23, 2024 and September 9, 2024 VBM Requests

The absence of ID verification for 219,673 VBM requests on June 23, 2024—followed by a repeat batch of 196,037 on September 9, 2024—constitutes prima facie evidence of substantial non-compliance with Florida election law and prima facie evidence of official misconduct. Together, these cycles establish a systemic pattern of statutory violations and felony-level misconduct, rebuttable

only if election officials produce contrary proof.

1. Violation of § 101.62(1)(b), Fla. Stat. – Lack of Required ID Verification

- Statutory Requirement: Each VBM request must include the voter's Florida driver's license number, Florida ID card number, or the last four digits of their SSN. SOEs cannot process requests without this verification.

- Prima Facie Violation:

  • June 23, 2024: 219,673 requests logged, all flagged "N/N."

  • September 9, 2024: A second round of 196,037 requests, again flagged "N/N."

- Impact: The repetition transforms the June 23 violations from an anomaly into systemic substantial non-compliance, meeting the threshold under § 102.168, Fla. Stat., for an election contest.

- Protected Voters: Because judges and law enforcement (protected under § 97.0585) cannot self-request online, the absence of ID verification indicates unauthorized insider overrides in VR Systems/FVRS.

2. Violation of § 104.047(4)(a), Fla. Stat. – Unauthorized Requests

- Statutory Requirement: It is a third-degree felony to request a VBM ballot on behalf of an elector without authorization.

- Prima Facie Violation:

  • Both June 23 and September 9 requests lacked ID verification and voter initiation, making them per se unauthorized.

  • For protected voters, insider overrides without consent are explicitly unauthorized.

- Impact: The scale and repetition demonstrate deliberate misconduct, not clerical error. Each unauthorized submission constitutes a separate felony violation.

3. Violation of § 104.011(1), Fla. Stat. – False Affirmations

- Statutory Requirement: Willfully providing false information in relation to elections is a felony.

- Prima Facie Violation:

  • Each fraudulent VBM request carried with it an implied false affirmation that the elector personally made the request and provided valid ID.

  • Repeating this on September 9, after the June 23 violations, compounds the fraud by showing that false affirmations were part of a systemic practice.

Legal Consequences of Repetition

- Compounding Evidence: Two independent batches (Sunday June 23, 2024 & September 9, 2024) prove a pattern of statutory violations.
- Substantial Non-Compliance: Strict compliance with verification statutes is required (Boardman v. Esteva, 323 So. 2d 259 (Fla. 1975)). Two cycles of mass failures establish substantial non-compliance.
- Official Misconduct: The scale and repetition constitute prima facie evidence of official misconduct under §§ 104.047(4)(a) and 104.011(1).
- Felony Exposure: Each fraudulent submission without ID = a separate felony count.
- Presumption: As in Thornburg v. Donovan, 330 So. 3d 614 (Fla. 2d DCA 2021), missing or defective verification records create a presumption of violation. Here, the repetition doubles that presumption. As further established in Thornburg v. Donovan, 866 So. 2d 176, 178 (Fla. 5th DCA 2004), the absence of required records creates a rebuttable presumption of statutory violation. The Supervisor of Elections' claim of "no responsive

records” for IP logs tied to the Sunday June 23, 2024 and September 9, 2024 requests — when such logs should exist for any voter-initiated submission — further supports prima facie evidence of official misconduct. **Moreover, election systems were designated as critical infrastructure by the U.S. Department of Homeland Security (DHS) on January 6, 2017, as a subsector of Government Facilities under § 1016(e) of the USA PATRIOT Act of 2001 (Pub. L. No. 107-56, 115 Stat. 272), due to their essential role in national security and democratic processes. This designation, overseen by the Cybersecurity and Infrastructure Security Agency (CISA), imposes heightened federal obligations for cybersecurity logging and data retention, including IP addresses as part of audit trails for access to systems like FVRS and VR Systems (§ 98.089(4), Fla. Stat.). The Cyber Incident Reporting for Critical Infrastructure Act of 2022 (CIRCIA) further mandates preservation of such logs for at least 2 years in response to potential cyber incidents, aligning with the PATRIOT Act's expansions for surveillance and record-keeping in critical sectors (§ 215,**

allowing access to business records like logs for national security). The absence of these logs—despite these federal duties—invokes the Valcin presumption of negligence and non-compliance (*Public Health Trust of Dade County v. Valcin*, 507 So. 2d 596 (Fla. 1987)), creating an unrebutted negative inference that the logs would reveal unauthorized insider origins (e.g., no public voter IPs on a non-business day), further evidencing violations of §§ 101.62(1)(b), 104.047(4)(a), and 104.011(1), Fla. Stat. This presumption shifts the burden to election officials to explain the absence or produce alternative evidence, absent which it supports systemic fraud and official misconduct.

Conclusion

The Sunday June 23, 2024 and September 9, 2024 fraudulent VBM requests, both lacking mandatory ID verification, both lacking IP logs of these requests, constitute prima facie evidence of violations of §§ 101.62(1)(b), 104.047(4)(a), and 104.011(1), Fla. Stat. The repetition elevates the case from irregularity to systemic fraud and misconduct, supporting claims of election fraud or contest under § 102.168, Fla. Stat. Accordingly, Petitioner requests this Court to take judicial notice

of these prima facie statutory violations as further grounds for prohibition, disqualification, and reassignment in this proceeding.

Certificate of Good Faith & Verification

Pursuant to § 38.10, Fla. Stat., I certify that this Petition is made in good faith and not for purposes of delay, but solely to preserve Petitioner's fundamental right to an impartial tribunal.

Further, Petitioner expressly reserves all federal claims and remedies, including but not limited to those arising under **42 U.S.C. § 1983** and the **Racketeer Influenced and Corrupt Organizations Act, 18 U.S.C. §§ 1961–1968**, based on the same operative facts alleged herein. This Petition is filed exclusively to invoke this Court's supervisory jurisdiction under Article V of the Florida Constitution and the Florida Rules of Appellate Procedure. It shall not be construed as waiving, limiting, or prejudicing Petitioner's right to seek relief in federal court, including declaratory, injunctive, and compensatory remedies.

/ s / Christopher Gleason
Christopher Gleason, Pro Se

VERIFICATION

Under § 92.525, Fla. Stat., I verify under penalty of perjury that the facts stated herein are true.

/s/ Christopher Gleason
Christopher Gleason, Pro Se

CERTIFICATE OF SERVICE

I certify that a true copy of this brief was served via the Florida Courts E-Filing Portal on July 26, 2025, to all counsel and parties of record.

JARED D. KAHN FLORIDA BAR NUMBER 105276 SENIOR ASSISTANT COUNTY ATTORNEY PINELLAS COUNTY ATTORNEY'S OFFICE 315 COURT STREET, SIXTH FLOOR CLEARWATER. FL 33756 PRIMARY E-MAIL ADDRESS: JKAHN@PINELLAS.GOV SECONDARY E-MAIL ADDRESS: ESERVICE@PINELLAS.GOV ATTORNEY FOR JULIE MARCUS,	KELLY L. VICARI FBN: 88704 ASSISTANT COUNTY ATTORNEY PINELLAS COUNTY ATTORNEY'S OFFICE 315 COURT STREET, SIXTH FLOOR CLEARWATER. FL 33756 PHONE: (727) 464-3354 / FAX: (727) 464-4147 PRIMARY E-MAIL ADDRESS: KVICARI@PINELLAS.GOV SECONDARY E-MAIL ADDRESS: ESERVICE@PINELLAS.GOV ATTORNEY FOR JULIE MARCUS
JEFFREY N. KLEIN FLORIDA BAR NUMBER 1025117 ASSISTANT COUNTY ATTORNEY PINELLAS COUNTY ATTORNEY'S OFFICE 315 COURT STREET, 6TH FLOOR CLEARWATER, FL 33756 TEL: 727-464-3354/FAX: 727-464-4147 PRIMARY E-MAIL ADDRESS: JKLEIN@PINELLAS.GOV SECONDARY E-MAIL ADDRESS: ESERVICE@PINELLAS.GOV	

ATTORNEY FOR DEFENDANT,	

/s/ Christopher Gleason
Pro Se Appellant

Closing Statement

The unrebutted prima facie evidence and verified facts presented in this Judicial Conflict Appendix (Tabs A–Z) demonstrate systemic judicial disqualification conflicts. The DOS reports, affidavits, and procedural history establish that multiple judges of the Second District Court of Appeal and Sixth Judicial Circuit are either direct victims, material witnesses, conflicted through relatives or staff, personally tied to, or are beneficiaries of the election fraud allegations.

Under Canon 3E, §§ 38.02/38.10, and Rule 2.330, recusal is mandatory in each instance. Livingston v. State requires that verified allegations be deemed true. Participation by conflicted judges constituted both structural error and fundamental error, rendering all resulting orders void ab initio. Reassignment to impartial judges is the only remedy consistent with due process.

Appendix B – Authorities Table

Florida Statutes

§ 38.02 – Mandatory disqualification where judge is a material witness.
§ 38.10 – Disqualification upon affidavit of bias.
§ 97.0585 – Protected voter confidentiality provisions.
§ 101.62(1)(b) – ID verification required for VBM requests.
§ 102.168 – Grounds for election contests.
§ 104.011(1) – False affirmations in elections.
§ 104.042 / 104.043 – Grand jury requests.
§ 104.047(4)(a) – Unauthorized VBM ballot requests.
§ 104.43 – Mandatory convening of grand jury upon affidavits.
§ 106.25(3) – Willful non-compliance = statutory violations.

Florida Rules of General Practice & Judicial Administration

Rule 2.330 – Disqualification of judges; verified motions deemed true.
Rule 2.330(e)(2) – Judge's family conflict.
Rule 2.330(e)(4) – Judge's staff conflict.

Florida Code of Judicial Conduct

Canon 2A – Judges must avoid even appearance of impropriety.
Canon 3E(1)(a) – Disqualification where impartiality may reasonably be questioned; material witness.
Canon 3E(1)(d) – Disqualification for spousal or familial conflicts.

Case Law

Livingston v. State, 441 So. 2d 1083 (Fla. 1983).
Boardman v. Esteva, 323 So. 2d 259 (Fla. 1975).
Thornburg v. Donovan, 866 So. 2d 176, 178 (Fla. 5th DCA 2004).
Lightsey v. State, 53 So. 3d 1093 (Fla. 1st DCA 2011).
Williams v. Pennsylvania, 579 U.S. 1 (2016).
Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009).

Jenkins v. Motorola, Inc., 911 So. 2d 196 (Fla. 3d DCA 2005).
State v. Smith, 240 So. 2d 807 (Fla. 1970).

Judicial Ethics Advisory Committee (JEAC) Opinions
JEAC Op. 17-20 – Recusal required when judge's close relatives or associates implicated.
JEAC Op. 18-13 – Disqualification mandatory where judge has personal knowledge of disputed facts.

Appendix C – Prima Facie Statutory Violations

The absence of ID verification for 219,673 VBM requests on June 23, 2024—followed by a repeat batch on September 9, 2024—constitutes prima facie evidence of substantial non-compliance with Florida election law and prima facie evidence of official misconduct. Together, these cycles establish a systemic pattern of statutory violations and felony-level misconduct.

Violations:

1. § 101.62(1)(b), Fla. Stat. – No ID verification.
2. § 104.047(4)(a), Fla. Stat. – Unauthorized requests.
3. § 104.011(1), Fla. Stat. – False affirmations.

Legal Consequences:

- Repetition (June 23 & Sept 9) = systemic violation.
- Substantial non-compliance under Boardman v. Esteva.
- Presumption of violation under Thornburg v. Donovan, 866 So. 2d 176, 178 (Fla. 5th DCA 2004).
- Each fraudulent submission = separate felony.
- Grounds for contest under § 102.168, Fla. Stat.

IN THE DISTRICT COURT OF APPEAL OF FLORIDA, SECOND DISTRICT

CHRISTOPHER GLEASON,
Appellant,

v.

Case No.: 2D2024-2688
LT CASE NO.: 24-003995-CI

JULIE MARCUS, in her official capacity as Supervisor of Elections for Pinellas County,
JULIE MARCUS, in her capacity as incumbent candidate for Supervisor of Elections, Pinellas County,
and the Pinellas County Canvassing Board,
Appellees.

APPENDIX TO APPELLANT'S EMERGENCY MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEF and to Appellant's Supplemental Brief

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Pursuant to Florida Rule of Appellate Procedure 9.220, Appellant submits the following record excerpts in support of the Emergency Motion for Leave to File Supplemental Brief and the accompanying Supplemental Brief.

Tab 1 – Verified Complaint (Caption & Service Certificate)

- **Caption:** Names Julie Marcus as defendant "in her official capacity as Supervisor of Elections" *and* "in her individual capacity as candidate."
- **Certificate of Service:** Reflects service on Julie Marcus without limitation, thereby effecting service in both capacities.

Tab 2 – Notice of Appearance (Filed by Pinellas County Attorney)

- **Text of Notice:** States counsel appears for "Julie Marcus, in her official capacity as Supervisor of Elections."
- **Limitation:** No appearance entered for Marcus in her individual/candidate capacity.

These record excerpts establish that: (1) the indispensable candidate party was named and served, but (2) no appearance was entered in that capacity. Together, these omissions create the jurisdictional defect addressed in the Motion and Supplemental Brief.

Respectfully submitted,

Respectfully submitted,

/s/ Christopher Gleason
Christopher Gleason
Pro Se Petitioner
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gleasonforpinellas@gmail.com

Date: August 26, 2025

CERTIFICATE OF SERVICE

I certify that a true copy of this brief was served via the Florida Courts E-Filing Portal on August 26, 2025, to all counsel and parties of record.

JARED D. KAHN **Florida Bar Number 105276** **Senior Assistant County Attorney** **Pinellas County Attorney's Office** **315 Court Street, Sixth Floor** **Clearwater. FL 33756** **Primary e-mail address: jkahn@pinellas.gov** **Secondary e-mail address: eservice@pinellas.gov** **Attorney for Julie Marcus,**	**KELLY L. VICARI** **FBN: 88704** **Assistant County Attorney** **Pinellas County Attorney's Office** **315 Court Street, Sixth Floor** **Clearwater. FL 33756** **Phone: (727) 464-3354 / Fax: (727) 464-4147** **Primary e-mail address: kvicari@pinellas.gov** **Secondary e-mail address: eservice@pinellas.gov** **ATTORNEY for Julie Marcus**
JEFFREY N. KLEIN **Florida Bar Number 1025117** **Assistant County Attorney** **Pinellas County Attorney's Office** **315 Court Street, 6th Floor** **Clearwater, FL 33756** **Tel: 727-464-3354/Fax: 727-464-4147**	

Primary e-mail address: jklein@pinellas.gov **Secondary e-mail address: eservice@pinellas.gov** **Attorney for Defendant,**	

/s/ Christopher Gleason
Christopher Gleason
Pro Se Appellant

CERTIFICATE OF COMPLIANCE

This brief complies with *Fla. R. App. P. 9.210* and *9.045* regarding font and word requirements.

/s/ Christopher Gleason
Christopher Gleason
Pro Se Appellant

Appendix Tab 1

Verified Complaint – Caption & Service Certificate

Record Excerpt:

- Caption naming Julie Marcus both:
  - "in her official capacity as Supervisor of Elections," and
  - "in her individual capacity as candidate."
- Certificate of Service reflecting service on Julie Marcus without limitation.

Legal Significance:

- Demonstrates that Marcus was named and served as a defendant in **both capacities**.
- Establishes that the **candidate party**, indispensable under § 102.168, Fla. Stat., was properly brought before the court.

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

Christopher Gleason,
Candidate for
Supervisor of Elections,
Pinellas County, Elector,
Citizen, and Taxpayer,

Plaintiff,

vs.

Case No.: 24-3995-CI
PRIORITY HEARING REQUESTED
PER FLA. STAT. § 102.168

Julie Marcus,
in her official capacity
as Supervisor of Elections for Pinellas County,
in her capacity as incumbent candidate for
Supervisor of Elections, Pinellas County

and **Pinellas County Canvassing Board,**

Defendants.

VERIFIED COMPLAINT TO CONTEST ELECTION BASED ON FRAUD, OFFICIAL MISCONDUCT, ILLEGAL REQUESTING OF VOTE-BY-MAIL BALLOTS, CONCEALMENT OF PUBLIC RECORDS, AND VIOLATION OF LEGAL REQUIREMENTS FOR VOTE-BY-MAIL BALLOTS

Plaintiff, Christopher Gleason, pursuant to § 102.168, Florida Statutes, and other applicable law, files this Verified Complaint to Contest the Election held on August 20, 2024 in Pinellas County, Florida, and alleges as follows:

INTRODUCTION

This action challenges the integrity of the election process in Pinellas County, Florida, based on substantial evidence of fraud, official misconduct, illegal requesting and distribution of vote-by-mail ballots, and violations of legal requirements governing such ballots, the administration of the

Filed, SEP 6, 2024, 11:24, Ken Burke, Clerk of the Circuit Court and Comptroller, Pinellas County

election with electronic voting systems connected to the internet via wireless modems which resulted in the EAC Certification being void in its entirety. The administering of elections with electronic voting systems that do not meet the Florida statutory requirements for accuracy (1 Error in 1,000,000 Occurrences). The administration of the election night results reporting using VR Systems Inc, resulting in a statewide crash due to massive misfeasance, malfeasance and neglect of duty in securing the technology used in the tabulation and reporting of ballots cast by voters. Plaintiff seeks to disqualify all 219,675 vote-by-mail ballots requested on June 23, 2024, and all 22,011 vote-by-mail ballots sent to undeliverable addresses or to voters who no longer resided at those addresses but were returned and counted. Plaintiff seeks to invalidate the election in its entirety and hold a new election without the illegal vote by mail ballots, and the voting systems that had void certifications and exceeded the maximum allowable error rates required under Florida Statute. Such pervasive and systemic violations of law mandate judicial intervention to ensure the integrity of the electoral process.

JURISDICTION AND VENUE

1. On August 20, 2024, the Primary Election was held.

2. This is an action to contest the election of Pinellas County Supervisor of Elections in Pinellas County, Florida, pursuant to § 102.168, Florida Statutes.

3. This Court has jurisdiction over this matter pursuant to Article V, Section 5 of the Florida Constitution and § 102.1685, Florida Statutes.

4. Venue is proper in Pinellas County, Florida, as the acts and omissions complained of occurred in Pinellas County, and the defendants are officials of Pinellas County.

Filed, SEP 6, 2024, 11:24, Ken Burke, Clerk of the Circuit Court and Comptroller, Pinellas County

5. **A statement of the grounds of contest may not be rejected, nor the proceedings dismissed, by the court for any want of form if the grounds of contest provided in the statement are sufficient to clearly inform the defendant of the particular proceeding or cause for which the nomination or election is contested.**

6. The Canvassing Board is assembled under §102.141, Fla. Stat., and performs important duties related to vote-counting, vote-ascertaining, and certifying the results of elections for Pinellas County under the Florida Election Code. The Canvassing Board is a necessary and indispensable party to an action, including this one, under § 102.168, Fla. Stat.

7. Under § 102.168(1), Fla. Stat., this Court has jurisdiction over this election contest, while §102.168(4) requires that this election contest be brought against both Marcus and the Canvassing Board.

8. Any candidate, qualified elector, or taxpayer presenting such a contest to a circuit judge is entitled to an immediate hearing. However, the court in its discretion may limit the time to be consumed in taking testimony, with a view therein to the circumstances of the matter and to the proximity of any succeeding election.

PARTIES

4. Plaintiff, Christopher Gleason, is a registered elector, citizen, taxpayer of Pinellas County, Florida, and a candidate for the office of Supervisor of Elections in the 2024 primary election.

5. Defendant, Julie Marcus, is the Supervisor of Elections for Pinellas County, Florida, responsible for overseeing the conduct of elections in the county, and the incumbent candidate for

Filed, SEP 6, 2024, 11:24, Ken Burke, Clerk of the Circuit Court and Comptroller, Pinellas County

Supervisor of Elections for Pinellas County also on the ballot in the August 20, 2024 Primary Election.

6. Defendant, Pinellas County Canvassing Board, is the entity responsible for canvassing the election returns in Pinellas County and certifying the results.

THE ELECTION

7. The vote results, aggregating votes made on the election day, early vote and vote-by-mail purportedly show Marcus defeating Gleason by 133,141 to 24,937 votes. **See Exhibit A**

8. The Canvassing Board met on August 23, 2024 and confirmed this final vote tally. On this basis, the Canvassing Board certified Marcus as the winner of the Seat and, upon information and belief, issued a certificate to Marcus under § 102.155, Fla. Stat, that certifies Marcus as the winner of the seat.

FACTUAL ALLEGATIONS

Illegal Requesting and Issuance of Vote-by-Mail Ballots

9. According to official election records that the Pinellas County Supervisor of elections submitted to the Florida Secretary of State Division of Elections, on Sunday, June 23, 2024, a day that the Pinellas County Supervisor of Elections was closed, 219,675 vote-by-mail ballots were illegally requested in violation of Fla. Stat. § 101.62.

10. Fla. Stat. § 101.62 mandates that vote-by-mail ballot requests must be made by the voter or an immediate family member designated by the voter.

11. According to Fla. Stat. § 101.62 there are only three methods for a voter to request the vote-by-mail ballot: A request may only be made in person, in writing, by telephone, or through the supervisor's website. This statute requires strict compliance, as the Florida Supreme Court has

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long held that any deviation from statutory requirements that affects the integrity of the ballot must be strictly scrutinized In ***Boardman v. Esteva*, 323 So. 2d 259, 269 (Fla. 1975)**, the Court emphasized that "[t]he purpose of the election laws is to ascertain the will of the people, and any substantial failure to comply with those laws that could affect the results of an election cannot be overlooked." The Court further noted that even minor deviations from statutory requirements that compromise the integrity of the voting process must be scrutinized.

12. In the context of vote-by-mail ballots, Florida law is explicit in its requirements for requesting and processing such ballots. Under Fla. Stat. § 101.62, a vote-by-mail ballot request must be made by the voter or by an immediate family member or legal guardian on behalf of the voter. This statute mandates strict compliance, and any deviation from these requirements renders the ballots void as a matter of law.

13. The systemic issue of illegally requested and sent vote-by-mail ballots is a clear violation of the strict compliance standard established by the Florida Supreme Court. The unlawful ordering of 219,675 vote-by-mail ballots in Pinellas County on a day when the Supervisor of Elections' office was closed, and the subsequent use of these ballots, violates both Fla. Stat. § 101.62 and established case law, such as ***Beckstrom v. Volusia County Canvassing Board*, 707 So. 2d 720 (Fla. 1998)**. In *Beckstrom*, the Court emphasized that election laws are to be strictly followed, particularly when dealing with absentee or vote-by-mail ballots, as any deviation could lead to the disenfranchisement of voters or the alteration of election outcomes.

14. It is mathematically impossible to claim that on Sunday June 23, 2024, so many Pinellas County voters **(219,675)** would suddenly decide to request a vote-by-mail ballot.

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15. If the Pinellas County Supervisor of Elections Office was closed on 06/23/2024 as it was a Sunday, there is no way possible for voters to have made the request via telephone, or in person, in writing.

16. There is only one possible legal explanation available, this would be if all 219,675 Pinellas County voters decided to request their vote by mail ballots via the Pinellas County Supervisor of Elections website, via VR Systems Inc voter focus functionality all on the same day. If this was the case there would be a log available that shows each voter logging in and requesting their vote-by-mail ballot. This explanation is also mathematically impossible.

17. The only logical and feasible possible explanation is that either Julie Marcus and her co-conspirators requested these vote-by-mail ballots for all 219,675 Pinellas County voters or someone at VR Systems Inc requested these vote-by-mail ballots. In either case Fla Stat. § 101.62 and § 104.0616 are being violated willingly and knowingly in a widespread and systematic fraudulent manner.

18. Despite the clear statutory mandate of Fla. Stat. § 101.62, these 219,675 illegal requests were processed without proper verification, and the 219,675 illegally requested vote-by-mail ballots made on Sunday June 23, 2024 without the required statutory consent or knowledge of the voters. **See Exhibit B**

19. On or around July 16, 2024, approximately 234,733 vote by mail ballots were sent out to Pinellas County voters. This is according to the Florida Department of State, Division of Elections Statewide Vote By Mail Early Voting Report available for direct download for candidates at the following url: https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports ,

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20. Of the 219,675 illegally requested vote-by-mail ballots that were sent to Pinellas County Voters, there were 35,756 vote-by-mail ballots sent out to voters at mailing addresses where the registered voters no longer resided, to addresses that were classified as vacant or undeliverable as addressed or with some classification that guaranteed the voter would not receive the vote by mail ballot. This determination was via the United State Postal Service deliverability database and the National Change of Address Databases. **See Exhibit C**

21. These 35,756 undeliverable vote-by-mail ballots should have been returned to the Pinellas County Supervisor of Elections office by the United States Postal Service in accordance with the law and United States Postal regulations.

Undeliverable Ballots Returned and Counted

22. Subsequent Statewide Vote By Mail Early Voting Reports revealed that of the 35,756 the vote-by-mail ballots that were sent to addresses where the voters no longer resided at or were classified as vacant or undeliverable as addressed, many thousands ended up being shown as having been cast and counted in the vote-by-mail canvassing.

23. Shockingly, 22,011 of the 35,756 vote-by-mail ballots were fraudulently shown as cast and counted in the election, which is a direct violation of the principles established by the Florida Supreme Court in ***Beckstrom v. Volusia County Canvassing Board*, 707 So. 2d 720 (Fla. 1998)**, which emphasized that strict compliance with statutory election procedures is essential to maintaining the integrity of the electoral process.

24. Furthermore, the subsequent Statewide Vote-By-Mail Early Voting Report shows 114,739 vote-by-mail ballots of the 219,675 illegally requested vote-by-mail ballots, being shown as counted and cast.

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25. The 114,739 illegally requested vote-by-mail ballots and the 22,011 vote-by-mail ballots sent to addresses where the voters no longer resided or to undeliverable as addressed materially affected the outcome of every single race in the August 20, 2024 election and raises significant concerns about the accuracy and legitimacy of the election results.

Concealment of Public Records – Concealment of Election Records

26. Plaintiff as a qualified candidate for the office of Supervisor of Elections requested the detailed information related to all the vote by mail ballots that had been returned as undeliverable to the Pinellas County Supervisor of Elections Office. Defendant Julie Marcus and her co-conspirators unlawfully concealed and delayed these critical ballot chain of custody requests in an attempt the prevent the Plaintiff from being able to identify the fraudulently cast vote-by-mail ballots in a timely manner in order to obtain a significant benefit Defendant Julie Marcus and others. **See Exhibit D**

27. Plaintiff as a qualified candidate for the office Supervisor of Elections, as well as other affected Pinellas County voters made public records requests for the election records of the 219,675 illegally requested vote by mail ballots made on Sunday June 23, 2024 pursuant to Fla. Stat. 101.62, and Chapter 119. Again, Defendant Julie Marcus and her co-conspirators willfully, knowingly and unlawfully concealed and delayed these critical ballot chain of custody requests in an attempt the prevent the Plaintiff from being able to identify the fraudulently requested vote-by-mail ballots in order to benefit Defendant Julie Marcus and others. See attached sworn affidavits from Pinellas County Voters stating that they did not request vote by mail ballots to be sent to them on 06/23/2024 as was reported by Defendants Julie Marcus, Dustin Chase and Matt Smith. **See Exhibit E**

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28. Plaintiff Gleason requested public records and official election records related to the chain of custody for the returned vote by mail ballots and for the illegally requested vote by mail ballots via the USPS and via Pinellas County Drop boxes. These requests too were willfully and knowingly concealed, delayed, or denied by the Defendant Julie Marcus, Supervisor of Elections and her co-conspirators. **See Exhibit F**

29. These election records have unlawfully been withheld from the Plaintiff in direct violation of 101.62, Chapter 119 and in violation of Fla. Stat. § 838.022, which criminalizes the falsification, concealment, delay or destruction of official records. The Florida Supreme Court has consistently held that such concealment violates the transparency required in the electoral process and further undermines public confidence in the election (*Gore v. Harris*, 772 So. 2d 1243 (Fla. 2000)).

30. The willful and knowing concealment, and unlawful delays by Defendants Julie Marcus, the Pinellas County Supervisor of Elections and her co-conspirators Dustin Chase and Matt Smith of these records has intentionally been used to impede the ability to verify the legality of the ballots cast, significantly compromising the transparency and integrity of the election.

31. This unlawful activity by Defendant Julie Marcus and her co-conspirators to knowingly and intentionally obtained a benefit for Defendant Julie Marcus and her co-conspirators and has caused significant unlawful harm to Pinellas County Electors, other Pinellas County Candidates for office, and taxpayers.

32. Through a conspiracy to obstruct, delay, and prevent the communication of information relating to the commission of no less than 219,675 individual felonies, that directly involves or affects the government entity served by the public servant or public contractor.

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Defendant Julie Marcus has caused significant harm to Plaintiff, other Pinellas County electors and taxpayers and created a constitutional crisis that must be remedied by the court.

33. Defendants Julie Marcus, Dustin Chase, Matt Smith and their co-conspirators have engaged in this similar pattern of fraudulent activity and official misconduct over numerous election cycles beginning under her time as Deputy Supervisor of Elections going back as far as 2009.

34. Defendant Marcus and her co-conspirators have illegally administered elections beginning on 2009 on ES&S electronic voting systems that connect to the internet via modems. The connectivity of modems, network devices and FIPS modules to the ES&S Tabulators voided the United States Election Assistance Commission Certifications in their entirety. **See Exhibit G**

35. The Florida Election System certification depends upon the United States Election Assistance Commission (EAC) Certification. If the EAC certification is void in its entirety so is the Florida State Certification. **See Exhibit H**

36. The ES&S electronic voting systems do not meet the Federal standards for maximum allowable error rate of 1 error in 125,000 occurrences. **See Exhibit** I

37. The ES&S electronic voting systems do not meet the Florida standards of accuracy of 1 error in 1,000,000 occurrences. **See Exhibit J**

38. To conceal the evidence of the ES&S systems failure to meet minimum security standards and minimum accuracy standards Defendant Julie Marcus and her co-conspirators have unlawfully withheld, concealed and altered election records.

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39. The use of uncertifiable voting systems, with certifications that were void in their entirety has effectively disenfranchised every single voter in Pinellas County Florida.

40. The ES&S voting systems, in use in Pinellas County since 2009 are responsible for the illegal adjudication of voters ballots as being 100% Blank when they were not in fact 100% Blank. **See Exhibit K**

41. This scheme to administer elections with these highly defective voting systems has created a Constitutional crisis where voters ballots and their votes have been deleted. These fraudulent actions have actually disenfranchised Pinellas County Voters and nullified the electors will and intent.

42. Defendant Julie Marcus and her co-conspirators have repeatedly and falsely claimed that a Blank Ballot is not a 100% Blank Ballot. Despite the fact that there is overwhelming and irrefutable evidence to the contrary. **See Exhibit K**

43. Defendant Julie Marcus and her co-conspirators have repeatedly and falsely claimed that a Blank Ballot is an "under vote ballot". This false statement made by Marcus and her co-conspirators is in direct conflict with numerous United States Election Assistance Commission Statutory Surveys, including the ones personally submitted by Maria Matthews the current Florida Director of Elections for the years 2012, 2014, and 2016. **See Exhibit L**

44. Defendant Julie Marcus and her co-conspirators altered official election reports to conceal the 100% Blank Ballot scheme that actually disenfranchised many thousands of Pinellas County Voters and Candidates during the 2018, 2020, 2022 and now 2024 elections. **See Exhibit M**

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45. Defendant Julie Marcus and her co-conspirators illegally withheld ES&S Operator Manuals using false declarations of copyright, trade secret claims or unreasonable special service charge fees and unreasonable delays of time. Despite there being a Florida Attorney General opinion AGO 2003-26 advising that the manuals were in fact public records open to inspection by the public. https://www.myfloridalegal.com/print/pdf/node/2169 **See Exhibit N**

46. Defendant Julie Marcus and her co-conspirator also falsely claimed that the Machine Configuration Reports, Machine Logs and Audit logs were not subject to public records requests due to false claims and denials based on trade secrets, copyright and critical infrastructure exemptions to disclosure. **See Exhibit O**

47. Defendant Julie Marcus also conspired to hide public records regarding the administration of elections and ballot chain of custody in order to conceal the fraudulent activities and official misconduct of her and her co-conspirators.

48. Perhaps, one of the most egregious concealment, delays and unlawful refusals to provide elections records, was when during the 2020 election Defendant Julie Marcus conspired with Sheriff Bob Gualtieri to allow then candidate Bob Gualtieri and his deputies to take possession of the very same ballots that Bob Gualtieri and Julie Marcus were both candidates on. **See Exhibit P**

49. When Public records requests were made for the chain of custody documents for the Pinellas County Sheriff and his deputies taking possession of ballots and the delegated legal authority for candidates for office to handle the very same ballots that they were candidates Defendant Marcus claimed that there were no responsive records. **See Exhibit Q**

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50. Defendant Julie Marcus and her co-conspirators made numerous false and malicious statements to the Tampa Bay Times about Gleason and the statutory definition of what a 100% Blank Ballot was, labeling Gleason as an "Election Denier", and claiming that Gleason's claims were debunked and categorically false. **See Exhibit R**

51. Defendant Julie Marcus unlawfully used public funds to help promote her campaign via advertising in publications to get out the vote and to sign up to receive a vote-by-mail ballot. Then concealed and delayed the costs related to the production of, mailing of and mailing of these electioneering material paid solely with Pinellas County Taxpayer fund. **See Exhibit S**

52. Defendant Julie Marcus unlawfully used public funds to corruptly promote her candidacy by sending out sample ballots to Pinellas County Voters with a VOTE logo, next to a picture of Julie Marcus, then her name, the Supervisor of Elections. This unlawful use of Public Funds and resources is particularly egregious due to the total expenditure of taxpayer funds for marketing her campaign. **See Exhibit T**

53. Defendant Julie Marcus and her co-conspirators then unlawfully concealed and delayed these expenditures made with public funds that she used to market her campaign using "Official Election Mail". **See Exhibit U**

54. For numerous years Marcus had previously falsely claimed that the ES&S voting systems were not connected to the internet. After whistleblowers came forward and provided evidence that they did have modems and they were connected to the internet Marcus retaliated against the whistleblowers.

55. On election night the ES&S voting systems "were connected" to the internet via wireless modems to transmit election results.

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56. VR Systems Election Night Reporting systems all went down resulting in a statewide crash of election results of most Florida counties.

57. The Pinellas County Canvassing Board and Julie Marcus the incumbent Supervisor of Elections rushed to certify the election results before an investigation of the VR Systems Inc failures related to election night reporting of results and an investigation into the 219,675 illegally made requests for vote-by-mail ballots also made via VR Systems Inc on Sunday June 23, 2024 a day that no requests for vote-by-mail ballots could be made other than by the same Pinellas County Supervisor of Elections website that was provided by VR Systems Inc as part of their contracts with the Pinellas County Supervisor of Elections Office.

58. Defendant Julie Marcus knowingly and willingly allowed non-US Citizens to register to vote in Pinellas County Elections by intentionally not verifying if these newly registered voters were in fact United States citizens. violating her Constitutional duty to ensure only US Citizens were being registered to vote.

COUNT I: ELECTION CONTEST BASED ON FRAUD

59. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 58 as if fully set forth herein.

60. The unauthorized requesting and issuance of 219,675 vote-by-mail ballots, subsequently then returned, cast and counted votes on the 114,739 illegally requested, vote-by-mail ballots, as well as the 22,011 undeliverable ballots, that also were reflected as being returned, cast and counted, then the conspiracy to delay and conceal related public records/election records documenting the unlawful requests constitute fraud under § 102.168(3)(a), Florida Statutes. **Section 104.047, Florida Statutes**: Governs fraudulent acts related to absentee ballots, including

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the illegal possession and marking of ballots. "[W]hen there is present fraud and intentional wrongdoing, which clearly affect the sanctity of the ballot and the integrity of the election process, courts must not be reluctant to invalidate those elections to ensure public credibility in the electoral process." ***(See Bolden v. Potter (1984) 452 So. 2d 564, 566.)***

61. These fraudulent actions violated **Section 104.047, Florida Statutes** which governs fraudulent acts related to absentee ballots, including the illegal possession and marking of ballots. Violations under this statute are felonies, making them a crucial point in challenging election results, directly impacted the integrity of the election, rendering the results unreliable and void. The number of illegal ballots cast far exceeds the margin of victory, which necessitates judicial intervention to protect the sanctity of the electoral process.

62. "Chapter 104 by the 1951 enactment, makes unlawful a variety of acts which subvert the elective process, e.g., false swearing, fraud in connection with casting a vote, corruptly influencing voters, illegal voting, and any act by an official who wilfully and fraudulently violates any of the provisions of the election code." ***(See State v. Brown (1974) 298 So. 2d 487, 489.)***

"Section 104.041, Florida Statutes…forbids fraudulent conduct in connection with any vote…" ***(See Trushin v. State (1980) 384 So. 2d 668, 678.)***

"The offense against the purity of elections and good morals would be just as flagrant if, by means of money, one should induce another who was not registered to fraudulently cast a vote to which he was not entitled, as if the corrupted voter was duly entitled to vote." ***(See id; State v. McCrocklin (1917) 186 Ind. 277, 115 N.E. 929.)***

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"It is possible that one who has not registered may, by assuming to be a person whose name appears upon the list, fraudulently induce the election managers to allow him to vote, and certainly, if he was induced to vote this fraudulent ticket by the use of money, he who induced him to commit this double crime would come as much in the purview of the statute as one who corrupted the franchise of a voter duly registered." (See id.)

63. Plaintiff seeks an order from this Court declaring the election results void and disqualifying all 219,675 vote-by-mail ballots requested on June 23, 2024, all 114,739 illegally requested and returned, cast and counted vote by mail ballots, and all 22,011 ballots that were sent to undeliverable addresses or to voters who no longer resided at those addresses yet were returned as being cast. **State ex rel Whitley v. Rhinehart, 192 So. 818 (Fla. 1939)**: This case supports the principle that absentee voting laws, being in derogation of common law, must be strictly construed. This would argue against any leniency or substantial compliance in cases involving absentee ballots.

COUNT II: ELECTION CONTEST BASED ON OFFICIAL MISCONDUCT

64. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 58 as if fully set forth herein.

65. The actions of the Supervisor of Elections in authorizing or failing to prevent the unauthorized requesting and subsequent issuance of illegal vote-by-mail ballots, the counting of fraudulently cast undeliverable ballots, and the concealment of related chain of custody records constitute official misconduct under § 102.168(3)(b), and 838.022 Florida Statutes.

66. The official misconduct materially affected the election results, requiring the election to be set aside. The Florida Supreme Court's decision in ***Beckstrom v. Volusia County***

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Canvassing Board confirms that strict compliance with election laws is not optional but mandatory, particularly when such violations have the potential to alter the election outcome.

67. Plaintiff seeks an order from this Court declaring the election results void and ordering a new election for the offices contested in the August 20, 2024 election.

COUNT III: ILLEGAL REQUESTING OF VOTE-BY-MAIL BALLOTS, ILLEGAL DELIVERY OF VOTE-MAIL-BALLOTS AND ILLEGAL CASTING OF VOTE-BY-MAIL BALLOTS

68. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 58 as if fully set forth herein.

69. The issuance of 219,675 vote-by-mail ballots without proper requests, including those made by unauthorized individuals, violates § 101.62 and § 104.0616, Florida Statutes, and constitutes an illegal act that affected the outcome of the election.

70. The strict compliance standard articulated by the Florida Supreme Court in ***Boardman v. Esteva*** mandates that such illegal activities invalidate the affected ballots and any election results based on them. **State ex rel Whitley v. Rhinehart, 192 So. 818 (Fla. 1939)**: supports the principle that absentee voting laws, being in derogation of common law, must be strictly construed. This would argue against any leniency or substantial compliance in cases involving absentee ballots. **Spradley v. Bailey, 292 So. 2d 27 (Fla. 1st DCA 1974)**: Reinforces the notion that strict compliance with absentee voting requirements is mandatory. Any deviations from statutory mandates in the processing of absentee ballots could be grounds for invalidation of those ballots.

71. Sections 104.041 and 104.051 of the Florida Statutes governs fraud in connection with casting a vote. The rule states that "[a]ny person perpetrating or attempting to perpetrate or aid in the perpetration of any fraud in connection with any vote cast, to be cast, or attempted to

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be cast, is guilty of a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084." (See Fla. Stat. § 104.04.)

72. "Any official who performs his or her duty as prescribed by this election code fraudulently or corruptly is guilty of a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084." (See Fla. Stat. § 104.05.)

73. Plaintiff seeks an order from this Court disqualifying all 219,675 vote-by-mail ballots requested on June 23, 2024, and declaring the election results void.

COUNT IV: CONCEALMENT OF PUBLIC RECORDS

74. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 58 as if fully set forth herein.

75. The willful, knowing, intentional delay, concealment, removal, alteration, and/or destruction of official public records related to elections by the Defendant Julie Marcus and her co-conspirators. This conspiracy to knowingly and intentionally obtain a benefit for themselves, and cause unlawful harm to Plaintiff, as a candidate for office, other candidates for office, all Pinellas County electors and Pinellas County taxpayers by concealing, covering up destroying, mutilating or altering any official record or official document, and obstructing, dalaying, and preventing the communication of information relating to the commission of a felony that directly involves or affects the government entity served by the public servant or public contractor, constitutes prima facie evidence of the violation of § 838.022, Florida Statutes titled Bribery – Official Misconduct, and a clear violation of 52 U.S. Code § 20702 - Theft, destruction, concealment, mutilation, or alteration of records or papers; penalties

76. This concealment was willingly, knowingly and intentionally done with the intent to obstruct the investigation into the illegal issuance and fraudulent casting of ballots, directly impacting the outcome of the election. The Florida Supreme Court in ***Gore v. Harris*** emphasized

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the need for transparency and the unlawful nature of such concealment. ***Gadd v. News-Press Publishing Co., 412 So 2d 894 (Fla. 2d DCA 1982):*** underscores that the intentional misrepresentation to obstruct access to public records constitutes unlawful concealment and misconduct. This misrepresentation of the time to produce records in this case aligns with the misconduct identified in Gadd.

77. The unlawful refusals, concealment and delays of information related to chain of custody of vote-by-mail ballots has materially impacted the outcome of the election and has harmed the Plaintiff, other candidates for office and the electors of Pinellas County.

78. Plaintiff seeks an order from this Court declaring the election results void and disqualifying all ballots associated with the concealed records and all ballots tabulated using uncertifiable voting systems, which were connected to the internet via a wireless modem or network device which voided the EAC certification for the voting system in its entirety.

COUNT V: FRAUD RELATED TO CASTING BALLOTS RETURNED AS UNDELIVERABLE

79. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 58 as if fully set forth herein.

80. The fraudulent casting of 22,011 ballots that had been returned as undeliverable constitutes a serious violation of Florida election laws, undermining the integrity of the election. The Florida Supreme Court has held that such systemic violations justify the voiding of affected ballots (***Beckstrom v. Volusia County Canvassing Board***). The fraudulent actions materially affected the outcome of the election, requiring judicial intervention to ensure the accuracy and fairness of the election results. It is well settled that "§ 104.041 includes within its proscriptions attempts to perpetrate the prohibited conduct. Thus whether or not the ballot was valid, one can be

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guilty of an attempt to perpetrate a fraud prohibited by the statute." ***(See Trushin v. State (1980) 384 So. 2d 668, 678.)***

81. Plaintiff seeks an order from this Court declaring the election results void and disqualifying all 219,696 illegally requested vote -by-mail ballots and 22,011 vote-by-mail ballots that were sent to undeliverable addresses or to voters who no longer resided at those addresses yet were fraudulently returned as being cast.

COUNT VI: FRAUD RELATED TO REGISTERING NON-US CITIZENS TO VOTE

82. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 58 as if fully set forth herein.

83. Defendant Julie Marcus and her co-conspirators have not conducted proper voter roll maintenance, and have allowed non-US Citizens to register to vote by not verifying that every voter on the voter roll is in fact a US Citizen. This is a clear violation of her Constitutional duty and a clear violation of numerous provisions of **HAVA (Help America Vote Act), 52 U.S. Code § 20507**.

84. Any official who performs his or her duty as prescribed by this election code fraudulently or corruptly is guilty of a felony of the third degree, punishable as provided in s. 775.082, s. 775.083, or s. 775.084.

COUNT VII: FRAUD RELATED ADMINISTERING ELECTIONS ON VOTING SYSTEMS THAT EXCEED MAXIMUM, ALLOWABLE ERROR RATES, CONNECED TO THE INTERNET, WITH VOID CERTIFICATIONS

85. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 58 as if fully set forth herein.

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86. Defendant Julie Marcus, has knowingly and willingly administered elections, using voting systems, that were connected to the internet via wireless modems, voiding the United States Elections Assistance Commission certification in its entirety.

87. Defendant Julie Marcus knowingly and willingly administered elections using electronic voting systems that illegally adjudicated voters ballots as being 100% Blank, in such scope and scale that it materially impacted every election that she administered. Defendant Julie Marcus also conspired to conceal and delay the communication of this information in a manner that prevented the communication of information related to the commission of felonies being committed within the Pinellas County Supervisor of Elections Office, a clear violation of Fla. Stat. 838.022(c).

88. Defendant Julie Marcus repeatedly misrepresented the facts about these activities to the public and to the voters of Pinellas County Florida.

COUNT VIII: MISCONDUCT, CORRUPTION, USE OF PUBLIC FUNDS, RESOURCES FOR ELECTIONEERING PURPOSES

89. Plaintiff re-alleges and incorporates by reference the allegations in paragraphs 1 through 58 as if fully set forth herein.

90. **Fla. Stat. 104.31(2)** restricts certain political activities by public officers, employees, and candidates, such as using their authority to influence elections. Violations of this statute, involving election officials using their office to interfere with the election process, are considered "misconduct."

91. **Fla. Stat. 106.113(1)** prohibits local governments from spending public funds to promote or oppose any candidate or ballot measure. Defendant Julie Marcus, Supervisor of Elections engaged in this activity, and directly violated this statute and constitutes "misconduct"

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under **Fla. Stat. 102.168**, by sending out Sample Ballots that clearly and prominently were printed saying VOTE: Julie Marcus Supervisor of Elections and were used as electioneering/campaign marketing materials in such a manner in which these marking/electioneering materials affected the election outcome.

92. Defendant Julie Marcus Supervisor of Elections' violations of these statutes involved exerting undue influence over the election, altering the electoral process, and engaged in activity that lead to biased results, indeed serve as valid grounds for an election challenge based on "misconduct."

PRAYER FOR RELIEF

WHEREFORE, Plaintiff, Christopher Gleason, respectfully requests that this Court:

1. Take jurisdiction over this matter and grant Plaintiff a hearing on this Complaint;

2. Declare the results of the August 20, 2024 election in Pinellas County, Florida, void due to fraud, official misconduct, illegal requesting of vote-by-mail ballots, the concealment of public records, the fraudulent casting of ballots returned as undeliverable, the use of uncertifiable voting systems that connected to the internet via wireless modems and network devices that voided the voting systems certifications in their entirety, and the cyber security issues related to the reporting of election data and election results by VR Systems Inc massive failure in every Florida County that they served.

3. Disqualify all 219,675 vote-by-mail ballots requested on June 23, 2024, and all 22,011 vote-by-mail ballots that were sent to undeliverable addresses or to voters who no longer resided at those addresses yet were returned as being cast;

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4. Cancel any illegally requested vote by mail ballots, made by Defendant Julie Marcus and her co-conspirators, and ensure that strict compliance with Fla Stat. 101.62 is in place going forward.

5. Order a new election for the offices contested in the August 20, 2024 election; to be administered on one day, with no early voting or vote-by-mail ballots, and manual hand count of all paper ballots cast.

6. Grant Plaintiff an award of attorneys' fees and costs, if applicable; and

7. Grant such other and further relief as this Court deems just and proper.

VERIFICATION

I, Christopher Gleason, verify under penalty of perjury that the facts stated in this Verified Complaint are true and correct to the best of my knowledge and belief.

Dated this 5th day of September, 2024.

/s/ Christopher Gleason

Christopher Gleason
1628 Sand Key Estates Court
Clearwater, FL 33767
727-480-2059
gleasonforpinellas@gmail.com
ProSe

CERTIFICATE OF SERVICE

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I hereby certify that a true and correct copy of the foregoing has been furnished by process server to Julie Marcus and the Pinellas County Canvassing Board this 5th day of September 2024.

Christopher Gleason

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AFFIDAVIT OF SERVICE

State of Florida **County of Pinellas** **County/Circuit Court**

Case Number: 24-003995-CI

SWA2024005130

Plaintiff/Petitioner: **CHRISTOPHER GLEASON, CANDIDATE FOR SUPERVISOR OF ELECTIONS, PINELLAS COUNTY, ELECTOR, CITIZEN, AND TAXPAYER,**
vs.
Defendant/Respondent: **JULIE MARCUS, IN HER OFFICIAL CAPACITY AS SUPERVISOR OF ELECTIONS FOR PINELLAS COUNTY, IN HER CAPACITY AS INCUMBENT CANDIDATE FOR SUPERVISOR OF ELECTIONS, PINELLAS COUNTY AND PINELLAS COUNTY CANVASSING BOARD**

For:
CHRISTOPHER GLEASON
1628 SAND KEY ESTATES CT.
CLEARWATER, FL 33767

Received by Nancy Chulla on the 6th day of September, 2024 at 1:14 pm to be served on **JULIE MARCUS, 13001 STARKEY RD, CLEARWATER, FL 33771**

I, Nancy Chulla, being duly sworn, depose and say that on the **9th day of September, 2024** at **10:00 am, I:**

SUBSTITUTE served by delivering a true copy of the **SUMMONS, VERIFIED COMPLAINT TO CONTEST ELECTION BASED ON FRAUD, OFFICIAL MISCONDUCT, ILLEGAL REQUESTING OF VOTE-BY-MAIL BALLOTS, CONCEALMENT OF PUBLIC RECORDS, AND VIOLATION OF LEGAL REQUIREMENTS FOR VOTE-BY-MAIL BALLOTS EXHIBITS AND FLASH DRIVE** with the date and hour of service endorsed thereon by me, to: **TERESA ROXBURGH** as **ADMINISTRATIVE SECRETARY**, a person employed therein and authorized to accept service for **JULIE MARCUS** at the address of: **13001 STARKEY RD, CLEARWATER, FL 33771**, the within named person's usual place of **Work**, in compliance with State Statutes.

Description of Person Served: Age: 56, Sex: F, Race/Skin Color: WHITE, Height: 5'6, Weight: 180, Hair: BLOND, Glasses: Y

I certify that I am over the age of 18, have no interest in the above action, and am a Appointed Process Server, in good standing, in the judicial circuit in which the process was served. Signed under the penalties of perjury, I declare that I have read the foregoing return of service and that the facts stated in it are true; NO NOTARY REQUIRED PURSUANT TO F.S. 92.525 (2)

Nancy Chulla

Nancy Chulla
APS #13340

1628 SAND KEY ESTATES CT.
CLEARWATER, FL 33767
(727) 480-2059

Subscribed and Sworn to before me on the 9th day of September, 2024 by the affiant who is personally known to me.

Pandora Fuchs

NOTARY PUBLIC

Notary Public State of Florida
Pandora Fuchs
My Commission HH 381665
Expires 4/2/2027

Our Job Serial Number: SWA-2024005130

1201256 -A

SPECIAL PROCESS SERVICE

Pinellas County, Florida
Bob Gualtieri, Sheriff

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ELECTRONICALLY FILED 09/09/2024 01:11:58 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

DELIVERED	9/9/2024 10:00 AM
SERVER	NC
LICENSE	APS #13340

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

Christopher Gleason,
Candidate for
Supervisor of Elections,
Pinellas County, Elector,
Citizen, and Taxpayer,

Plaintiff,

vs.

Case No.: 24-003995-CI
PRIORITY HEARING REQUESTED
PER FLA. STAT. § 102.168

Julie Marcus,
in her official capacity
as Supervisor of Elections for Pinellas County,
in her capacity as incumbent candidate for
Supervisor of Elections, Pinellas County

and **Pinellas County Canvassing Board,**

Defendants.
_____/

SUMMONS

THE STATE OF FLORIDA:

To each Sheriff of the State:

YOU ARE COMMANDED to serve this summons and a copy of the complaint or petition in this action on defendant: **JULIE MARCUS**, in her official capacity as Supervisor of Elections of Pinellas County Florida.

Each defendant is required to serve written defenses to the complaint or petition on _____, plaintiff, whose address is: 1628 SAND KEY ESTATES COURT, CLEARWATER FL 33767 within 20 days* after service of this summons on that defendant, exclusive of the day of service, and to file the original of the defenses with the clerk of this court either before service on plaintiff's attorney or immediately thereafter. If a defendant fails to do so, a default will be entered against that defendant for the relief demanded in the complaint or petition.

Dated on: 9/6/2024

, Clerk of the Court

By: Nicole Mahaney

As Deputy Clerk

Appendix Tab 2

Notice of Appearance – Filed by Pinellas County Attorney

Record Excerpt:

- Notice states appearance is entered for "Julie Marcus, in her official capacity as Supervisor of Elections."
- No entry of appearance for Marcus in her individual/candidate capacity.

Legal Significance:

- Confirms that counsel limited representation strictly to the **official capacity**.
- Demonstrates that Marcus **never appeared** in her indispensable role as **candidate**.
- Supports Appellant's claim that the judgment is void for want of appearance by an indispensable party.

Filing # 206535450 E-Filed 09/10/2024 10:54:39 AM

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON, Candidate for Supervisor of Elections, Pinellas County, Elector, Citizen, and Taxpayer,

Plaintiff,

v.

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et al.,

Defendants.

_____/

OFFICIAL CAPACITY ONLY

Case No.: 24-003995-CI
UCN: 522024CA003995XXCICI

NOTICE OF APPEARANCE AND DESIGNATION OF EMAIL ADDRESS PURSUANT TO RULE 2.516

The undersigned attorney, JARED D. KAHN, hereby files this Notice of Appearance as counsel of record for Defendant, **Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections,** in the above-styled cause of action and requests that all future pleadings, correspondence and any and all communication be directed to the undersigned.

Furthermore, pursuant to Florida Rule of Judicial Administration 2.516, the undersigned attorney hereby designates the following primary and secondary email addresses for service:

Primary Email Address: jkahn@pinellas.gov

Secondary Email Address: eservice@pinellas.gov

ELECTRONICALLY FILED 09/10/2024 10:54:39 AM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Filing # 206535450 E-Filed 09/10/2024 10:54:39 AM

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON, Candidate for Supervisor of Elections, Pinellas County, Elector, Citizen, and Taxpayer,

Plaintiff,

v.

Case No.: 24-003995-CI
UCN: 522024CA003995XXCICI

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et al.,

Defendants.

_____/

NOTICE OF APPEARANCE AND DESIGNATION OF EMAIL ADDRESS PURSUANT TO RULE 2.516

The undersigned attorney, JARED D. KAHN, hereby files this Notice of Appearance as counsel of record for Defendant, **Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections,** in the above-styled cause of action and requests that all future pleadings, correspondence and any and all communication be directed to the undersigned.

Furthermore, pursuant to Florida Rule of Judicial Administration 2.516, the undersigned attorney hereby designates the following primary and secondary email addresses for service:

Primary Email Address: jkahn@pinellas.gov

Secondary Email Address: eservice@pinellas.gov

ELECTRONICALLY FILED 09/10/2024 10:54:39 AM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing document was filed with the Clerk of the Circuit Court by using the Florida Courts E-Filing Portal and simultaneously served through email to **CHRISTOPHER GLEASON**, **PRO SE,** Plaintiff at gleasonforpinellas@gmail.com, cpgleason72@gmail.com and immutabletruth@protonmail.com on the 10th day of September 2024.

/s/ Jared D. Kahn

JARED D. KAHN
Florida Bar Number 105276
Senior Assistant County Attorney
Pinellas County Attorney's Office
315 Court Street, Sixth Floor
Clearwater, FL 33756
Phone: (727) 464-3354 / Fax: (727) 464-4147
Primary e-mail address: jkahn@pinellas.gov
Secondary e-mail address: eservice@pinellas.gov
Attorney for Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections

PCAO 489341

Appendix Tab 3 - Motions for Disqualification with Verification and Affidavits

DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
SECOND DISTRICT
1700 N. Tampa Street, Suite 300, Tampa FL 33602

July 16, 2025

CHRISTOPHER GLEASON,
APPELLANT(S)
V.

JULIE MARCUS, IN HER OFFICIAL CAPACITY AS PINELLAS COUNTY SUPERVISOR OF ELECTIONS, ET AL.,
APPELLEE(S).

CASE NO.: 2D2024-2688
L.T. No.: 522024CA003995XXCICI

BY ORDER OF THE COURT:

To the extent the relief requested in appellant's "Memorandum of Law in Support of Emergency Motion to Disqualify Judges, to Vacate Conflicted Rulings, for Stay of Proceedings, and for Coordination of Related Cases" has not been previously denied, the remainder of the relief requested therein is denied.

Appellant's "Amended and Supplemented Motion to Disqualify County Attorneys and Bar Use of Taxpayer Funds for Defense" is denied.

Appellant's "Motion for Leave to Respond to the April 2, 2025, Show-Cause Order," directed to this court order in case 2D2024-2687 was granted in case 2D2024-2687. To the extent the motion remains pending in this case number, the motion is denied as moot.

Appellant's "Motion to Strike Confidentiality Arguments and for Sanctions under Rule 9.410" is denied.

Appellant's "Motion to Strike Appellees' Motions as Sham Pleadings, Fraud upon the Court, and Evidence of Official Misconduct, Pervasive Conspiracy, Unauthorized Activity, and Bad Faith" is denied.

"Appellee's Motion to Strike or Deny all Pending Motions and Motion to Dismiss" is denied. Appellant shall serve the initial brief within 10 days of the date of this order or this appeal will be dismissed.

Additional motions or pleadings filed prior to the deadline for filing the initial brief shall not tolerate the time for filing the initial brief under Florida Rule of Appellate Procedure 9.300(b).

I HEREBY CERTIFY that the foregoing is a true copy of the original court order.

Mary Elizabeth Kuenzel
Mary Elizabeth Kuenzel, Clerk
2D2024-2688 7/16/25

DS

Served:
PINELLAS CLERK
CHRISTOPHER GLEASON
JARED DOUGLAS KAHN
JEFFREY KLEIN
KELLY LYNN VICARI

Filing # 221001287 E-Filed 04/15/2025 02:48:37 AM

IN THE DISTRICT COURT OF APPEAL OF FLORIDA, SECOND DISTRICT

Case No.: 2D2024-2687
Case No.: 2D2024-2688

Christopher Gleason
Appellant/Petitioner, Pro Se,

v.

Julie Marcus, et al.
Appellees/Respondents.

EMERGENCY MOTION TO DISQUALIFY JUDGES NELLY N. KHOUZAM, MORRIS SILBERMAN, CRAIG C. VILLANTI, ANTHONY C. BLACK, EDWARD C. LAROSE, AND SUSAN H. ROTHSTEIN-YOUAKIM, TO VACATE CONFLICTED RULINGS, FOR STAY OF PROCEEDINGS, AND FOR COORDINATION OF RELATED CASES

COMES NOW, Christopher Gleason, pro se Appellant/Petitioner, pursuant to Florida Rule of General Practice and Judicial Administration 2.330, Florida Rule of Appellate Procedure 9.100, 9.310, 9.430, Florida Statutes §§ 38.02 and 38.10, and Canon 3E of the Florida Code of Judicial Conduct, and files this emergency motion to disqualify Judges Nelly N. Khouzam, Morris Silberman, Craig C. Villanti, Anthony C. Black, Edward C. LaRose, and Susan H. Rothstein-Youakim from the appellate panel, vacate all rulings issued by these judges in Case No. 2D2024-2687 and related Case No. 2D2024-2688, vacate rulings by Sixth Judicial Circuit judges Patricia Muscarella, Peter Ramsberger, and Shawn Crane in Case No. 522024CA003717XXCICI and Case No. 522024CA003995XXCICI, stay all

proceedings in these cases pending resolution, and coordinate Case No. 2D2024-2687 with Case No. 2D2024-2688 to ensure consistent adjudication. This motion presents irrefutable evidence of a pervasive vote-by-mail (VBM) fraud scheme compromising judicial officers across the Second District and Sixth Circuits, posing an immediate threat of irreparable harm through void rulings, necessitating urgent disqualification, vacatur, stay, and coordination to remedy egregious constitutional violations.

In support, I state:

1. This emergency motion confronts an irreconcilable conflict arising from Khouzam, Silberman, and Villanti's undeniable status as material witnesses and victims in a massive VBM fraud scheme central to this appeal and related Case No. 2D2024-2688, compounded by Silberman's spousal tie to Khouzam. Black, LaRose, and Rothstein-Youakim hold substantial stakes in the fraud-tainted 2024 retention elections. Sixth Circuit judges Muscarella (fraud victim), Ramsberger (familial conflict via son and daughter-in-law), and Crane (judicial assistant as fraud victim) issued tainted trial rulings in Case No. 522024CA003717XXCICI and likely Case No. 522024CA003995XXCICI, infecting these appeals with systemic bias that renders the tribunal constitutionally defective and risks further void orders absent immediate relief.

2. Florida Division of Elections' "Vote By Mail Early Voting Reports" (Exhibit B, to be filed) expose unverified VBM requests for Khouzam (Voter ID: 106723453), Silberman (106869196), Villanti (113787369), Muscarella, and Crane's judicial assistant, Louise Smith, on June 23 and September 9, 2024, marked "N" (no ID), constituting indisputable fraud affecting Case No. 2D2024-2687 and Case No. 2D2024-2688 (Exhibit H, page 10; Notice of Newly Discovered Evidence, Case No. 2D2024-2688). Ramsberger's son, Judge Thomas M. Ramsberger, and daughter-in-law, Angela Ramsberger, suffered identical violations (Exhibit A, Ramsberger Motion, Case No. 2D2024-2687).

3. As protected voters (F.S. § 97.0585), Khouzam, Silberman, Villanti, and Muscarella's data demands rigorous verification, brazenly bypassed (Exhibits D, I, L, Exhibit O). Smith and Thomas/Angela Ramsberger's requests confirm deliberate breaches (F.S. § 101.62; Ramsberger Motion, paragraph 8).

4. On June 23, 2024, a Sunday, Pinellas elections office was closed (Exhibit C), rendering 219,675 unverified requests (99%), including Smith's, impossible (Exhibit H, page 5; Rule 1S-2.055(3)(b)).

5. September 9, 2024, requests (196,037 unverified, Exhibit H, page 6) were duplicative for Khouzam, Silberman, Villanti, Muscarella, Smith, and Thomas/Angela Ramsberger, defying Rule 1S-2.055(3)(d), logged in FVRS (Exhibits D, E).

6. Silberman's marriage to Khouzam creates an intolerable conflict (Canon 3E(1)(d)), their shared victimization entrenching personal knowledge (Rule 2.330(d)(1)).

7. Black, LaRose, and Rothstein-Youakim's 2024 retention (68.6–69.7% "yes," Florida Division of Elections) secured salaries (~$200,000+, F.S. § 26.031) in a tainted election (Exhibit H, page 6), creating stark bias (Caperton, 556 U.S. 868 (2009); Aetna Life Ins. Co. v. Lavoie, 475 U.S. 813 (1986)).

8. Exhibit H confirms fraud ensnaring 56 officers, including three Second DCA judges (page 10) and 17 Sixth Circuit judges, with Muscarella named (Exhibit B; Notice, Case No. 2D2024-2688). Assistants, including Louise Smith, and others are targeted (Exhibit O, Exhibit H, pages 8–9).

9. The Second DCA's oversight (F.S. § 35.05) fosters collegial bonds (Exhibit G context). Fraud implicating Muscarella, Ramsberger (protecting his son's role), Crane (via Smith), and assistants (Exhibit H, pages 6–9; Exhibit O) across Case No. 2D2024-2687, Case No. 2D2024-2688, Case No.

522024CA003717XXCICI, and Case No. 522024CA003995XXCICI risks Second DCA bias in shielding peers (Canon 3E(1)(a); Ward v. Village of Monroeville, 409 U.S. 57 (1972)). Prior motions against Muscarella and Ramsberger expose trial taint (Ramsberger Motion, paragraph 13; Notice, paragraph 6).

10. Rule 2.330(d)(1) mandates recusal for Khouzam, Silberman, Villanti, Muscarella, and Crane's witness status (via Smith) and Silberman's tie. Rule 2.330(d)(2) demands Ramsberger's disqualification. Black, LaRose, Rothstein-Youakim's interests compel recusal (Caperton; Aetna). Sixth Circuit fraud creates a non-negotiable barrier (Tumey, 273 U.S. 510 (1927); Rippo v. Baker, 580 U.S. 285 (2017)).

11. Timely filed within 30 days of April 11, 2025 (Exhibit B), supplemented by March 6, 2025 (Exhibit A; Ramsberger Motion, paragraph 1) and Smith's verification, this motion complies with Rule 2.330(e).

12. Exhibits D, I, L reveal ignored safeguards for Khouzam, Silberman, Villanti, Muscarella, Smith, and Thomas/Angela Ramsberger ("Requester Name," "Relationship to Voter"; Exhibit H). June 23 closure (Exhibit C) and September 9 duplicates confirm fraud.

13. Exhibits E, F, J, K, M expose neglected tools (e.g., Absentee Alert, Exhibit M) for 219,675 requests (Exhibit H). I demand Exhibit N logs (F.S. § 119.07).

14. Six Second DCA judges' conflicts, plus Sixth Circuit fraud (Muscarella, Ramsberger's tie, Crane via Smith) across four cases, inflict a structural error, automatically voiding proceedings (Williams, 136 S. Ct. 1899 (2016); Weaver, 137 S. Ct. 1899 (2017)). No harmless error applies.

15. Caperton, Tumey, In re Murchison, 349 U.S. 133 (1955), Ward, Aetna, and Rippo condemn conflicted adjudication. Fraud's infiltration, with Muscarella, Ramsberger, and Crane's rulings tainted, perpetrates an undeniable due process violation, mandating immediate relief.

16. The evidence makes clear that this is not a theoretical concern. It is a legally documented breakdown in the integrity of the vote-by-mail process that directly affects the composition of the reviewing tribunal. When a judge fails to recuse under circumstances where their impartiality may reasonably be questioned—and where they are a material witness or victim of the very conduct under appellate review—the resulting proceedings are fundamentally unfair. Such non-recusal constitutes a violation of due process under the Fourteenth Amendment, as reaffirmed in Tumey v. Ohio,

273 U.S. 510 (1927), where the U.S. Supreme Court held that even a potential conflict of interest on the part of a judge violates due process, and in In re Murchison, 349 U.S. 133 (1955), where the Court emphasized that 'no man can be a judge in his own case' and condemned proceedings that carry even the appearance of partiality. Disqualification and vacatur are therefore constitutionally required, as no harmless error review can cure this defect.

17. Emergency Basis and Stay:

- The pervasive fraud (Exhibit H, 56 officers; Exhibit O) creates an imminent risk of void rulings by Khouzam, Silberman, Villanti, Black, LaRose, Rothstein-Youakim in Case No. 2D2024-2687 and Case No. 2D2024-2688, and enforcement of tainted orders by Muscarella, Ramsberger, Crane in Case No. 522024CA003717XXCICI and Case No. 522024CA003995XXCICI, causing irreparable harm (Dura-Stress, Inc. v. Law, 634 So. 2d 769 (Fla. 5th DCA 1994)).
- Strong evidence (Exhibit B, Exhibit A, Louise Smith) ensures likelihood of success on disqualification and vacatur (Caperton).

- Public interest in untainted tribunals outweighs delay, given election fraud's gravity (Bush v. Gore, 531 U.S. 98 (2000)).
- A stay is critical to halt proceedings until an impartial tribunal is secured (Williams, Weaver).

18.I demand:

- (a) Disqualification of Khouzam, Silberman, Villanti, Black, LaRose, Rothstein-Youakim from Case No. 2D2024-2687 and Case No. 2D2024-2688.
- (b) Vacatur of all Second DCA rulings by these judges in Case No. 2D2024-2687 and Case No. 2D2024-2688.
- (c) Vacatur of Sixth Circuit rulings by Muscarella, Ramsberger, and Crane in Case No. 522024CA003717XXCICI and Case No. 522024CA003995XXCICI.
- (d) Stay of all proceedings in Case No. 2D2024-2687, Case No. 2D2024-2688, Case No. 522024CA003717XXCICI, and Case No. 522024CA003995XXCICI, including enforcement of conflicted rulings, pending resolution.

- (e) Coordination or consolidation of Case No. 2D2024-2687 and Case No. 2D2024-2688 to ensure consistent adjudication (Fla. R. Jud. Admin. 2.545).
- (f) Reassignment, transfer to another DCA, or Supreme Court certification (Art. V, § 2(b), Fla. Const.).

WHEREFORE, I urgently request emergency relief: disqualification, vacatur of all tainted rulings, stay of proceedings, coordination of Case No. 2D2024-2687 and Case No. 2D2024-2688, and transfer to restore judicial integrity.

CERTIFICATE OF GOOD FAITH

I certify this emergency motion is filed in good faith, grounded in facts instilling profound bias fear, solely for justice, not delay.

/s/ Christopher Gleason
2098 Seminole Boulevard, #6212
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Disqualify Judge Nelly N. Khouzam was served via the Florida Courts E-Filing Portal, or by U.S. Mail and/or email where appropriate, on April 14, 2025, to the following:

- Clerk of the Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602

- Clerk of the Sixth District Court
- The Honorable Judge Nelly N. Khouzam, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- The Honorable Judge Morris Silberman, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- The Honorable Judge Craig C Villanti, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- The Honorable Judge Anthony C. Black, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- The Honorable Judge Edward C. LaRose, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- The Honorable Judge Susan H. Rothstein-Youakim, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- Jared N. Kahn, Esq., Attorney for Appellee Julie Marcus (jkahn@pinellas.gov) (eservice@pinellas.gov)
- Kelly L. Vicari, Esq., Attorney for Appellee Julie Marcus (kvicari@pinellas.gov) (eservice@pinellas.gov)
- Jeffrey N. Klein, Esq. – Attorney for Appellee Pinellas County Canvassing Board (eservice@pinellas.gov)

CERTIFICATE OF COMPLIANCE

This motion complies with Rule 9.045(e), using 14-point Times New Roman font.

Respectfully submitted,

/s/ Christopher Gleason
Christopher Gleason

2098 Seminole Boulevard, #6212
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com, gleasonforpinellas@gmail.com
Pro Se Appellant/Petitioner

EXHIBITS

Exhibit A – Affidavit of Christopher Gleason (April 1**1**, 2025)

Exhibit B – Florida Department of State "Vote By Mail Early Voting Reports" (Redacted)

Exhibit C – Screenshot and Calendar Showing June 23, 2024 (Sunday) from votepinellas.gov

Exhibit D – VR Systems: "Dialog: Process Web Vote-By-Mail Requests" (Protected Voter Display)

Exhibit E – VR Systems: "About Data Files Sent to FVRS by Voter Focus"

Exhibit F – VR Systems: "How to Process Received Mail Ballot Requests"

Exhibit G – Second District Court of Appeal Judge Roster (screenshot from 2dca.flcourts.gov)

Exhibit H – Affidavit of John Siamas (April 7, 2025)

Exhibit I – VR Systems Manual: "Dialog: Vote-By-Mail Request"

Exhibit J – VR Systems Manual: "About Capturing Questionable Vote-By-Mail Requests from the Web"

Exhibit K – VR Systems Report: "Questionable Web Requests for an Election"

Exhibit L – VR Systems Dialog: "Mail-Ballot Adjustments"

Exhibit M – VR Systems Report: "Absentee Alert Report"

Exhibit N – VR Systems Report: "Absentee Activity Dump"

Exhibit O - Summary of Affected Judicial Officers and Staff

Exhibit P – Pinellas Protected Voter Block

Exhibit Q – Voter Affidavits

EXHIBIT A:

Christopher Gleason Affidavit April 11, 2024

IN THE DISTRICT COURT OF APPEAL OF FLORIDA, SECOND DISTRICT

Case No.: 2D2024-2687

Case No.: 2D2024-2688

Christopher Gleason
Appellant/Petitioner, Pro Se,

v.

Julie Marcus, et al.
Appellees/Respondents.

AFFIDAVIT OF CHRISTOPHER GLEASON IN SUPPORT OF MOTION TO DISQUALIFY JUDGE NELLY N. KHOUZAM

STATE OF FLORIDA
COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Christopher Gleason, who, being duly sworn, deposes and says:

1. I am the Appellant/Petitioner in the above-captioned matter and make this affidavit in support of my Motion to Disqualify Judge Nelly N. Khouzam.

2. I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and belief.

3. I obtained the official election records from the Florida Department of State, Division of Elections titled *Vote By Mail Early Voting Reports* (Exhibit B), from the Florida State Secretary of State Division of Elections website at the

following secure download URL: (https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports). These public records/ election records showed that vote-by-mail requests were submitted in the name of Judge Nelly N. Khouzam on June 23, 2024, and again on September 9, 2024.

4. Judge Khouzam is a protected voter under Florida Statutes § 97.0585, meaning her voter information is confidential and cannot be accessed or used for vote-by-mail ballot requests without verified identity and legal authorization.

5. These vote-by-mail requests were flagged as "N" (no verified ID) in the Florida Voter Registration System (FVRS), confirming they were submitted without the legally required authentication.

6. The June 23, 2024, request was made on a Sunday, a day on which the Pinellas County Supervisor of Elections office was closed (Exhibit C), making in-person or phone requests legally impossible. Moreover, Exhibit I (VR Systems Manual: Vote-By-Mail Request Dialog) confirms that protected voters cannot submit online requests without manual override by staff with elevated credentials.

7. VR Systems' internal user manual (Exhibit I) explains that protected voter profiles—such as Judge Khouzam's—trigger automatic flags that prevent any online vote-by-mail request submission. These records can only be modified through elevated access credentials by elections staff. Furthermore, as outlined in Exhibit E and F, Voter Focus software requires manual identity verification and restricts processing of such requests to specific user roles with administrative clearance. Exhibit I (VR Systems Manual: Vote-By-Mail Request Dialog) explicitly states that protected voter profiles, per F.S. § 97.0585, are blocked from online VBM submissions to prevent unauthorized access. Any request requires manual entry by staff with elevated credentials, logged with user ID and timestamp (Exhibit N). Thus, the June 23, 2024, request for Judge Khouzam, and 219,673 others including protected voters, is legally impossible absent unauthorized override.

8. According to Rule 1S-2.055(3)(d), a valid vote-by-mail request remains active through December 31, 2026. Thus, the September 9, 2024, request was not only unverified but also redundant and indicative of a procedural breach or unauthorized override.
9. Rule 1S-2.043(2)(a) of the Florida Administrative Code requires that any vote-by-mail request contain "the name, address, and date of birth of the

voter and the requestor, if different." Such criteria were not met in either of Judge Khouzam's VBM entries, further supporting the conclusion of procedural violation.

10. Exhibit I further describes that each VBM request requires fields for the "Requester Name," "Relationship to Voter," and an auto-generated "Request Date." The absence of valid requester data and the use of blocked channels for a protected voter supports the conclusion that these requests were fraudulent.

11. Additionally, Exhibit N (Absentee Activity Dump) confirms that the Florida Voter Registration System maintains a comprehensive log of all VBM activity, including the user ID, timestamp, and method of submission. These audit logs would pinpoint exactly when and how Judge Khouzam's VBM entries were created or modified—offering forensic confirmation of unauthorized access. I requested Absentee Ballot Request Information logs from the Pinellas County Supervisor of Elections to verify the June 23, 2024, entries (Exhibit N). The Supervisor claimed production would take 19,000 hours, despite VR Systems' automated daily uploads to FVRS (Exhibit E). This refusal violates F.S. § 838.022 and F.S. § 119.07 and suggests concealment of evidence confirming fraudulent entries, including Judge Khouzam's, warranting an adverse inference that logs would reveal

unauthorized access. F.S. § 119.11 requests filed, Supervisor of Elections 19,000 hours claim is baseless (Times Publ'g Co.).

12. Based on additional information provided by John Siamas (Exhibit H), a 2024 Florida Senate candidate, this case forms part of a larger pattern of vote-by-mail fraud affecting over 56 judicial officers, including Judge Khouzam and multiple members of this appellate court. John Siamas (Exhibit H) identified 219,673 unverified VBM requests on June 23, 2024, from Pinellas County, comprising 99% of statewide requests, with 219,628 lacking ID verification (Exhibit B). Over 56 judicial officers, including protected voters like Judge Khouzam, were targeted, violating F.S. § 97.0585. This unprecedented spike, on a Sunday when no verification was possible (Exhibit C), indicates a coordinated scheme compromising the Second DCA and Sixth Circuit's impartiality. The 219,673 requests on June 23, 2024, a Sunday, represent a statistically impossibility for legitimate voter activity, particularly for protected voters barred from online submissions (Exhibit I), confirming fraudulent intent. I obtained signed affidavits from 18 voters, attesting they did not request VBM ballots on June 23, 2024, yet received them (Exhibit Q). These confirm unauthorized FVRS entries, mirroring Judge Khouzam's unverified request (Exhibit B) and John

Siamas's data of 219,673 illegal requests (Exhibit H). As protected voters are blocked from online submissions (Exhibit I), these ballots violate F.S. § 97.0585, F.S. § 101.62, F.S. 104.0616, evidencing a fraudulent scheme compromising judicial impartiality. League of Women Voters v. Detzner, 172 So. 3d 363 (Fla. 2015), condemns election concealment. The 219,673 unverified requests (Exhibit B), Judge Dubbeld's non-consent (¶18), 18 affidavits (Exhibit P), and 19,000-hour log delay (Exhibit E) evidence fraudulent intent, violating F.S. § 104.0616. Marks v. Stinson, 19 F.3d 873 (3d Cir. 1994), voids elections for VBM fraud. The 219,673 unauthorized requests (Exhibit B), including Judges Khouzam and Dubbeld (¶18), with 18 affidavits (Exhibit P), violate due process, requiring tribunal recusal and vacatur. John Siamas (Exhibit H) identified 219,673 unverified VBM requests… League of Women Voters v. Detzner, 172 So. 3d 363 (Fla. 2015), condemns election concealment, and Marks v. Stinson, 19 F.3d 873 (3d Cir. 1994), voids VBM fraud. These violations, with Judge Dubbeld's non-consent (¶18), evidence fraud. FVRS logs counties separately ("About Data Files Sent to FVRS"). Pinellas affidavits (Exhibit Q) confirm local fraud." ("Report: Absentee Status")

13. My investigation revealed Judge Jennifer Dubbeld, listed in Exhibit O, was unaware of her June 23, 2024, VBM request (Exhibit B). On October 22, 2024, then candidate for Judge Jennifer Dubbeld and I had a conversation reinforced my belief, based on Florida Department of State Division of Elections Vote by Mail Early Voting Reports and FVRS data (Exhibit B), 18 voter affidavits (Exhibit P), that unauthorized requests also targeted protected voters like Jennifer Dubbeld, creating bias requiring recusal (Rule 2.330(d)(1)).

14. Exhibit G confirms Judge Khouzam's active service on the Second DCA panel. Her name, and those of at least eight other judges on this court, appear in the vote-by-mail fraud data referenced by John Siamas (Exhibit H), indicating that the fraud is not isolated to a single individual but may compromise the structural neutrality of the entire reviewing tribunal. Rogers v. State, 630 So. 2d 513 (Fla. 1993), holds that cumulative bias creates structural error. The 219,673 unverified VBM requests, including Judges Khouzam and Dubbeld (Exhibit O), and assistants (Exhibit P), violate F.S. § 97.0585, compromising this tribunal's impartiality.

15. Based on cross-referenced data from the same public records referenced in Exhibit B, I have identified not only judges but also judicial assistants

assigned to chambers of the Second District Court of Appeal and the Sixth Judicial Circuit whose vote-by-mail ballots were fraudulently requested under similar circumstances. These unauthorized requests were also flagged as unverified (N status) and processed using blocked request paths. As judicial assistants are direct agents of their assigned judges, the inclusion of their voter records implicates those judges as potential material witnesses, further compromising their ability to serve impartially. This significantly expands the appearance of partiality across both trial and appellate benches and reinforces the existence of structural error that renders this tribunal constitutionally inadequate.

16. A detailed table of affected judges and judicial assistants is provided in Exhibit O, identifying 56 judicial officers and their assistants across the Second District Court of Appeal and Sixth Judicial Circuit with unverified vote-by-mail (VBM) requests on June 23, 2024, flagged as "N" (no verified ID) in the Florida Voter Registration System (FVRS) (Exhibit B). These include, but are not limited to, Judge Nelly N. Khouzam, Judge Morris Silberman, Judge Craig C Villanti, Judge Patricia Muscarella, Judge Thomas Ramsberger, Judge Judge Judge Jennifer Dubbeld, Chief Judge Shawn Crane's judicial assistant Louise Smith, Judge Edwin Jagger, Judge Lauralee G. Westine, Judge Kim Campbell, Judge Pamela A.M. Campbell, Judge

Sherwood Coleman, Judge Philip J Federico, Judge Evan Frayman, Judge Brian Gnage, Judge Mary M. Handsel, Judge Elizabeth Jack, Judge George Jirotka, Judge Doneene Loar, Judge Philippe Matthey, Judge Patrice Moore, Judge Cynthia J. Newton, Judge Nichole Pearlman, Judge Joshua Riba, Judge Pat Siracusa, Judge James R. Stearns, Judge Susan St. John, Judge Kimberly Todd, Judge Amy M. Williams, Judge John Carassas, Judge Diane Croff, Judge Robert Dittmer, Judge Holly Grissinger, Judge James Pierce, Judge John D Couriel, Judicial Assistant Debi McCarty, Judicial Assistant Stacy Wisman, Judicial Assistant Jill Psenisky, Judicial Assistant Bonnie Whitehall, Judicial Assistant Valerie McGivern, Judicial Assistant Melinda Vincent, Judicial Assistant Annie Nguyen, Judicial Assistant Jess Rayburn, Judicial Assistant Amber Demiduk, Judicial Assistant Veronica Jupiter, Judicial Assistant Lisa Schultz, Judicial Assistant Tracy Curley, Judicial Assistant Michelle Hall, Judicial Assistant JoAn Caffentzis, Judicial Assistant Vicki Masterson, Judicial Assistant Cheryl Nierengarten, Judicial Assistant Darleta Burris, Judicial Assistant Pamela Gariepy, Judicial Assistant Kim Haumann, all targeted in violation of F.S. § 97.0585, as protected voter profiles are blocked from online submissions (Exhibit I, "Dialog: Vote-By-Mail Request"). For example, Chief Judge Crane's assistant had an unverified request, implicating his chambers despite no

personal request, indicating a targeted scheme reaching judicial operations ("Report: Absentee Status for All Absentee Voters"). As judicial assistants are direct agents managing court functions, their compromised voter records create an appearance of bias for their judges, per Canon 3E(1)(a) of the Florida Code of Judicial Conduct. This pervasive fraud, affecting 56+ individuals across both trial and appellate benches, reinforces structural error rendering this tribunal constitutionally inadequate, as held in Rogers v. State, 630 So. 2d 513 (Fla. 1993), and Aetna Life Insurance Co. v. Lavoie, 475 U.S. 813 (1986) (¶19). The full scope, detailed in Exhibit O, mandates disqualification of Judge Khouzam and scrutiny of the entire tribunal to ensure due process. This table highlights the extent to which both trial and appellate court chambers are compromised, including instances where judges' assistants—but not the judges themselves—were targeted. Given their confidential role and direct connection to the judge's functioning, any such instance raises mandatory grounds for judicial disqualification under Canon 3E(1)(a). "For example, even in chambers where the judge's own record does not show a ballot request—such as Chief Circuit Shawn Crane—their judicial assistant's record was fraudulently accessed. This indicates a targeted scheme reaching into judicial chambers, rendering the judge a potential witness or person with direct knowledge of disputed facts."

Exhibit O lists numerous judicial assistants, assigned to numerous Judges, in the Sixth Circuit, with unverified VBM requests on June 23, 2024, flagged "N" in FVRS (Exhibit B). As direct agents managing judicial operations, their compromised voter records create an appearance of bias for their judges, per Canon 3E(1)(a), extending disqualification grounds to multiple Second DCA and Sixth Circuit panels.

17. The evidence shows that Judge Khouzam is both a material witness and a victim in the scheme central to this appeal. Under Rule 2.330(d)(1), disqualification is required when a judge has personal knowledge of disputed evidentiary facts. Canon 3E(1)(a) of the Florida Code of Judicial Conduct also mandates disqualification where a judge is likely to be a material witness.

18. The verified activity under Judge Khouzam's name and the appearance of her data in protected voter records, combined with the 'N' verification flags and administrative irregularities outlined in Exhibits C, I, and N, establish a well-grounded fear of judicial bias. Per Livingston v. State, 441 So. 2d 1083 (Fla. 1983), a reasonably prudent person would fear bias from Judge Khouzam, as her unauthorized VBM request (Exhibit B), confirmed by Judge Dubbeld's non-consent (¶18) and 18 voter affidavits (Exhibit P), violates F.S. § 97.0585, mandating disqualification.

19. The facts presented here would lead a reasonably prudent person to doubt Judge Khouzam's ability to remain impartial. Her continued participation in this appellate proceeding would violate my constitutional right to a fair and unbiased tribunal. The unauthorized VBM requests, including 219,673 on June 23, 2024, and withholding of audit logs, violates F.S. § 838.022 may violate F.S. § 104.061 (corrupt influence) and F.S. § 104.051 (election interference), constituting felonious acts that undermine judicial impartiality and public trust, further necessitating Judge Khouzam's recusal. Liljeberg v. Health Services Acquisition Corp., 486 U.S. 847 (1988), mandates disqualification under 28 U.S.C. § 455(a) when impartiality is questioned, as with Judge Khouzam's fraudulent VBM request (Exhibit B), corroborated by Judge Dubbeld (¶18) and 18 affidavits (Exhibit P), suggesting tribunal bias. Aetna Life Insurance Co. v. Lavoie, 475 U.S. 813 (1986), finds structural error when a judge has a personal stake, as with Judge Khouzam's and Judge Dubbeld's fraudulent VBM requests (Exhibit B), part of 219,673 violations (Exhibit P), tainting this tribunal. United States v. Microsoft Corp., 253 F.3d 34 (D.C. Cir. 2001), vacates rulings for apparent bias under 28 U.S.C. § 455(a). Judge Khouzam's and Judge Dubbeld's VBM fraud (Exhibit B), with 18 affidavits (Exhibit P), requires vacatur to protect due process. Caperton…

Williams… Liljeberg v. Health Services Acquisition Corp., 486 U.S. 847 (1988), and Aetna Life Insurance Co. v. Lavoie, 475 U.S. 813 (1986), mandate vacatur for bias… United States v. Microsoft Corp., 253 F.3d 34 (D.C. Cir. 2001), voids rulings for apparent bias affecting Judges Khouzam and Dubbeld (¶18).

20. My analysis of the State of Florida Division of Elections "Vote by Mail Early Voting Reports" and the VR Systems program documentation confirms that 219,673 vote by mail ballot requests made on Sunday, June 23, 2024, a date that the Supervisor of Elections was closed requires manipulation. As an election systems analyst I attest that 219,673 unverified requests require bots, automated or insider manipulation, violating F.S. § 104.061

21. The U.S. Supreme Court has made clear in *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009), and *Williams v. Pennsylvania*, 136 S. Ct. 1899 (2016), that judicial participation in cases where a judge is a material witness or has a personal stake constitutes a structural defect. These precedents apply directly here and demand disqualification as a matter of due process.

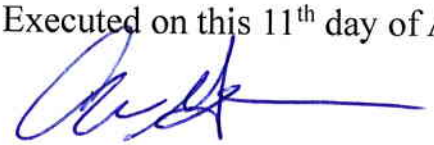
22. The information referenced in Exhibits E, F, I, and related VR Systems documentation was obtained directly from publicly accessible training and support materials hosted on the official VR Systems website

(https://www.vrsystems.com) and (https://content.vrsys.co/help/vf/Content/Voter_Registration/Dialog__Vote-by-Mail_Request.htm) or from publicly available sources previously published online. These documents were not obtained through confidential or privileged means and are available to election administrators, public records requestors, and researchers. Chastine v. Broome, 629 So. 2d 293 (Fla. 4th DCA 1993), requires vacatur if a biased judge rules. Judge Khouzam's fraudulent VBM request (Exhibit B), Judge Dubbeld's confirmation (¶18), and 219,673 violations (Exhibit P) mandate her disqualification to avoid voidable rulings.

23. I submit this affidavit in good faith and respectfully request that the Court consider these facts and disqualify Judge Nelly N. Khouzam from participation in this appeal. and respectfully request that the Court consider these facts and disqualify Judge Nelly N. Khouzam from participation in this appeal. I request Judge Khouzam's disqualification, a stay of proceedings under Rule 9.310 to compel FVRS log production, coordination with related cases per Rule 2.545, and an order under F.S. § 119.11 to access withheld logs, ensuring a fair tribunal and investigation of fraud affecting 219,673 VBM requests.

FURTHER AFFIANT SAYETH NAUGHT.

I declare under the penalty of perjury that the foregoing is true and correct.
Executed on this 11th day of April, 2025 at Largo, Florida.



/s/ Christopher Gleason

Christopher Gleason
2098 Seminole Boulevard, #6212
Largo, FL 33778
Phone 727-480-2059
Email: cpgleason72@gmail.com, gleason4pinellas@gmail.com

Sworn to and subscribed before me on this 11th day of April, 2025, by Christopher Gleason, who [X] is personally known to me or [ ] produced a Florida Driver's License as identification.

_____, No: _____).

/s/ _____
Notary Public
Name: _____
Commission No: _____
My Commission Expires: _____

CHRISTINE PETERS
Commission # HH 436653
Expires February 26, 2028

EXHIBIT B:

Excerpt Florida Department of State Vote By Mail Early Voting Reports

EXHIBIT B Excerpt of Florida Department of State, Division of Elections “Vote By Mail; Early Voting Report” For 09/03/2024

Covering August 2024 Primary – 06/23/2024 Illegal Vote By Mail Ballot Requests

Recor	Coun	VoterIdNumber	ElectionNi	ElectionDa	ElectionNa	LastRecorc	Vot	RequesteDate	Delivery Date	BallotRetu	Re	Mil	Ov	Mil	Prec	PrecinctSp	Congressi	SenateDis	HouseDist	CountyCo	SchoolBo	OtherDist	Party	Voter Name	M	MailingAd	MailingAd	MailingAddress	City	Mai	Mailing	Ma	E-mi	Fa	De	Voter	FLDL/	VoterSSN
VBM	PIN	106741060	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	BARTLETT, BRUCEL								BBAI			N	N	
VBM	PIN	106876672	43887	45524	2024 Prim	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	Y	N	Y										NPA	COLEMAN, SHERWOOD S											N	N	
VBM	PIN	107374929	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N										REP	CROFF, DIANE M											N	N	
VBM	PIN	111215604	43887	45524	2024 Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N										REP	DITTMER, ROBERT G								ROB			N	N	
VBM	PIN	107149377	43887	45524	2024 Prim	8/11/2024	P	6/23/2024	7/16/2024		N	N	N										REP	DUBBELD, JENNIFER C								DUB			N	N	
VBM	PIN	106986554	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										REP	FEDERICO, PHILIP J											N	N	
VBM	PIN	107285314	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	GNAGE, BRIAN E								bgna			N	N	
VBM	PIN	106995645	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	GRISSINGER, HOLLYT								griss			N	N	
VBM	PIN	107366706	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										NPA	JACK, ELIZABETH M											N	N	
VBM	PIN	103848463	43887	45524	2024 Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N										REP	JUPITER, VERONICA L								vero			N	N	
VBM	PIN	106993896	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										NPA	KELLY, LORRAINE M								LORI			N	N	
VBM	PIN	106723453	43887	45524	2024 Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N										REP	KHOUZAM, NELLYN											N	N	
VBM	PIN	106821566	43887	45524	2024 Prim	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N										REP	LENAS, JAMES S											N	N	
VBM	PIN	107338189	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	LOAR, DONEENE D								DON			N	N	
VBM	PIN	107285166	43887	45524	2024 Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N										DEM	LUCAS, CHERYLL								CHE			N	N	
VBM	PIN	107075643	43887	45524	2024 Prim	7/23/2024	V	6/23/2024	7/16/2024	7/23/2024	N	N	N										REP	MARCUS, JULIE K											N	N	
VBM	PIN	107150747	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N										NPA	MASTERSON, VICKIA								lmki			N	N	
VBM	PIN	107385240	43887	45524	2024 Prim	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N										REP	MATTHEY, PHILIPPE											N	N	
VBM	PIN	106958587	43887	45524	2024 Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N										DEM	MOORE, PATRICE W								pwm			N	N	
VBM	PIN	106784723	43887	45524	2024 Prim	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N										REP	MUSCARELLA, PATRICIA A								tmus			N	N	
VBM	PIN	107071107	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N										REP	NEWTON, CYNTHIA J											N	N	
VBM	PIN	100554220	43887	45524	2024 Prim	8/10/2024	P	6/23/2024	7/16/2024		N	N	N										REP	PEARLMAN, NICOLE M								NPE			N	N	
VBM	PIN	106815101	43887	45524	2024 Prim	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N										REP	PIERCE, JAMES V								jame			N	N	
VBM	PIN	107171797	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										DEM	RAMSBERGER, ANGELA M								ANG			N	N	
VBM	PIN	107143704	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N										NPA	RAMSBERGER, THOMAS M								TOM			N	N	
VBM	PIN	106991733	43887	45524	2024 Prim	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N										REP	RIBA, JOSHUA B								JRIB			N	N	
VBM	PIN	106869196	43887	45524	2024 Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N										NPA	SILBERMAN, MORRIS											N	N	
VBM	PIN	107328087	43887	45524	2024 Prim	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N										NPA	ST JOHN, SUSAN											N	N	
VBM	PIN	106750878	43887	45524	2024 Prim	6/25/2024	P	6/23/2024	7/16/2024		N	N	N										REP	STEARNS, JAMES R								aste			N	N	
VBM	PIN	106869683	43887	45524	2024 Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N										REP	TODD, KIMBERLY P								KIMI			N	N	
VBM	PIN	113787369	43887	45524	2024 Prim	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N										NPA	VILLANTI, CRAIG C								CCV			N	N	
VBM	PIN	106972664	43887	45524	2024 Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N										REP	WESTINE, LAURALEE G								lwes			N	N	
VBM	PIN	106715884	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										REP	WILLIAMS, AMY M											N	N	
VBM	PIN	107067204	43887	45524	2024 Prim	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	416	416	13	18	61	6	6	CCA,1	CT	REP	MCCARTY, DEBRAL	10			TAMPA	FL	33612					N	N	
VBM	PIN	106817396	43887	45524	2024 Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	421	421	13	18	58	5	5	CCA,2	CT	REP	JIROTKA, GEORGEM	11			BELLEAIR SHORE	FL	33786					N	N	
VBM	PIN	125032393	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	516	516	13	21	58	5	5	CCA,2	CT	DEM	SMITH, LOUISEP	12			CLEARWATER	FL	33755					N	N	
VBM	PIN	107388567	43887	45524	2024 Prim	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	518	518.1	13	21	58	5	5	CCA,2	CT	DEM	GUALTIERI, GALAS	13			CLEARWATER	FL	33755					N	N	
VBM	PIN	123861050	43887	45524	2024 Prim	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	606	606.1	13	21	57	4	4	CCA,1	CT	REP	HALL, MICHELLE B	13			SAFETY HARBOR	FL	34695					N	N	
VBM	PIN	107377969	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	517	517.1	13	21	58	5	5	CCA,2	CT	NPA	HAUMANN, KIMM	14			CLEARWATER	FL	33755	KIMI				N	N	
VBM	PIN	120581459	43887	45524	2024 Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	539	539	13	21	57	4	4	CCA,2	FC	DEM	SCHULTZ, LISAM	18			PALM HARBOR	FL	34683	LISA				N	N	
VBM	PIN	106772419	43887	45524	2024 Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	632	632	13	21	57	4	4	CCA,1	FC	REP	SIRACUSA, PAT	18			PALM HARBOR	FL	34684	PATS				N	N	
VBM	PIN	106862612	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	530	530	13	21	57	4	4	CCA,2	CT	REP	DESANTIS, KARENA	18			DUNEDIN	FL	34698	kdes				N	N	
VBM	PIN	106862613	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	530	530	13	21	57	4	4	CCA,2	CT	REP	DESANTIS, RONALDD	18			DUNEDIN	FL	34698	DES/				N	N	
VBM	PIN	107203935	43887	45524	2024 Prim	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	420	420.1	13	18	58	5	5	CCA,2	CT	NPA	FRAYMAN, EVAN G	20			INDIAN ROCKS BEACH	FL	33785	efray				N	N	
VBM	PIN	106926631	43887	45524	2024 Prim	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	622	622	13	21	57	4	4	CCA,1	CT	NPA	CAFFENTZIS, JOAN	20			OLDSMAR	FL	34677	joma				N	N	
VBM	PIN	113659838	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	155	155.1	14	18	60	6	6	CCA,3	CT	REP	RAYBURN, JESSICAD	30			ST PETERSBURG	FL	33702	jessi				N	N	
VBM	PIN	107033915	43887	45524	2024 Prim	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	625	625	13	21	57	4	4	CCA,1	FC	DEM	DEMIDUK, AMBER D	31			PALM HARBOR	FL	34684-4	ADEI				N	N	
VBM	PIN	124912657	43887	45524	2024 Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	623	623.1	13	21	58	4	4	CCA,1	CT	REP	WHITEHALL, BONNIEM	31			CLEARWATER	FL	33761					N	N	
VBM	PIN	106873482	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	636	636	13	21	57	4	4	CCA,1	FC	REP	VINCENT, MELINDAL	31			PALM HARBOR	FL	34685	VINC				N	N	
VBM	PIN	107033524	43887	45524	2024 Prim	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	627	627.1	13	21	57	4	4	CCA,1	FC	REP	NIERENGARTEN, CHERYL D	43			OLDSMAR	FL	34677	CNIE				N	N	
VBM	PIN	106981943	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	244	244	13	18	61	7	7	CCA,1	CT	REP	MCGIVERN, VALERIE B	48			KENNETH CITY	FL	33709	kishl				N	N	
VBM	PIN	106978328	43887	45524	2024 Prim	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	216	216	13	18	61	7	7	CCA,3	CT	NPA	PSENISKY, JILLS	55			ST PETERSBURG	FL	33707	Jill.P				N	N	
VBM	PIN	106859620	43887	45524	2024 Prim	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	244	244.1	13	18	61	7	7	CCA,1	FC	REP	BURRIS, DARLETAJ	56			ST PETERSBURG	FL	33709	DJB1				N	N	
VBM	PIN	107379308	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	232	232	13	18	61	7	7	CCA,3	CT	DEM	NGUYEN, ANNP	56			ST PETERSBURG	FL	33710	annp				N	N	
VBM	PIN	106878898	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	230	230	13	18	61	7	7	CCA,3	CT	DEM	CURLEY, TRACYD	63			ST PETERSBURG	FL	33710					N	N	
VBM	PIN	107118442	43887	45524	2024 Prim	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	712	712.1	13	21	57	4	4	CCA,2	CT	REP	WISMAN, STACYL	84			TARPON SPRINGS	FL	34689	stac				N	N	

EXHIBIT B: Excerpt of Florida Department of State, Division of Elections "Vote By Mail; Early Voting Report" For 11/09/2024

County	VoterIdNum	ElectionNu	ElectionDa	ElectionNa	LastRecord(	Voti	RequestedI	Delivery Dat	BallotReturn	Req	Mili	Ov	Mil	Preci	Precin	Con	Sen	Hou	Con	Sc	OtherDistr	Party	Voter Name	Mail	Ma	Mai	MailingAd	MailingAd	MailingAd	E-ma	Faxn	Des	Des	Voter	FLDL/	VoterSSN4
PIN	106741060	43888	11/5/2024	2024 Gene	10/29/2024	V	9/9/2024	10/1/2024	10/29/2024	N	N	N										REP	BARTLETT, BRUCEL							BBAF				N	N
PIN	107167732	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	CAMPBELL, KIMBERLY A							KIMC				N	N
PIN	106758700	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	CAMPBELL, PAMELA AM											N	N
PIN	107149377	43888	11/5/2024	2024 Gene	10/30/2024	P	9/9/2024	10/1/2024		N	N	N										REP	DUBBELD, JENNIFER C							DUBI				N	N
PIN	107125137	43888	11/5/2024	2024 Gene	11/5/2024	V	9/9/2024	10/1/2024	11/5/2024	N	N	N										REP	FESTA, NOELLE E											N	N
PIN	110785320	43888	11/5/2024	2024 Gene	9/11/2024	P	9/9/2024	10/1/2024		N	N	N										REP	GIBSON, KATHLEEN E							kathi				N	N
PIN	117216165	43888	11/5/2024	2024 Gene	11/2/2024	V	9/9/2024	10/1/2024	11/2/2024	N	N	N										NPA	GRIMES, WENDY L							wgrir				N	N
PIN	106808845	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										NPA	HILL, KAREN D							KIKID				N	N
PIN	107366706	43888	11/5/2024	2024 Gene	10/22/2024	P	9/9/2024	10/1/2024		N	N	N										NPA	JACK, ELIZABETH M											N	N
PIN	130471287	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N										REP	JAGGER, BLAKE B							BJAC				N	N
PIN	106832762	43888	11/5/2024	2024 Gene	11/2/2024	V	9/9/2024	10/1/2024	11/2/2024	N	N	N										REP	JAGGER, EDWIN B							EJAG				N	N
PIN	111191787	43888	11/5/2024	2024 Gene	10/24/2024	V	9/9/2024	10/1/2024	10/24/2024	N	N	N										REP	KAHN, JARED D							jared				N	N
PIN	107015570	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	KERR, CHRISTOPHIR A							CHRI				N	N
PIN	107018866	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	KERR, LISA M							KERF				N	N
PIN	106723453	43888	11/5/2024	2024 Gene	11/1/2024	P	9/9/2024	10/1/2024		N	N	N										REP	KHOUZAM, NELLY N											N	N
PIN	107203473	43888	11/5/2024	2024 Gene	11/3/2024	V	9/9/2024	10/1/2024	11/3/2024	N	N	N										REP	KOSKINAS, THOMAS D							TOMI				N	N
PIN	107338188	43888	11/5/2024	2024 Gene	10/15/2024	V	9/9/2024	10/1/2024	10/15/2024	N	N	N										REP	LOAR, DONEENED							DON				N	N
PIN	107075643	43888	11/5/2024	2024 Gene	10/21/2024	V	9/9/2024	10/1/2024	10/21/2024	N	N	N										REP	MARCUS, JULIE K											N	N
PIN	107385240	43888	11/5/2024	2024 Gene	10/13/2024	V	9/9/2024	10/1/2024	10/13/2024	N	N	N										REP	MATTHEY, PHILIPPE											N	N
PIN	106958587	43888	11/5/2024	2024 Gene	10/23/2024	V	9/9/2024	10/1/2024	10/23/2024	N	N	N										DEM	MOORE, PATRICEW							pwm				N	N
PIN	106784723	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	MUSCARELLA, PATRICIA A							tmus				N	N
PIN	107071107	43888	11/5/2024	2024 Gene	11/5/2024	V	9/9/2024	10/1/2024	11/5/2024	N	N	N										REP	NEWTON, CYNTHIA J											N	N
PIN	100554220	43888	11/5/2024	2024 Gene	10/7/2024	V	9/9/2024	10/1/2024	10/7/2024	N	N	N										REP	PEARLMAN, NICOLE M							NPEA				N	N
PIN	106894052	43888	11/5/2024	2024 Gene	11/1/2024	P	9/9/2024	10/1/2024		N	N	N										REP	PETERS, KATHLEEN M							Kathl				N	N
PIN	107171787	43888	11/5/2024	2024 Gene	11/5/2024	V	9/9/2024	10/1/2024	11/5/2024	N	N	N										DEM	RAMSBERGER, ANGELA M							ANG				N	N
PIN	107143704	43888	11/5/2024	2024 Gene	10/25/2024	V	9/9/2024	10/1/2024	10/25/2024	N	N	N										NPA	RAMSBERGER, THOMAS M							TOMI				N	N
PIN	106991733	43888	11/5/2024	2024 Gene	10/18/2024	V	9/9/2024	10/1/2024	10/18/2024	N	N	N										REP	RIBA, JOSHUA B							JRIBA				N	N
PIN	100307077	43888	11/5/2024	2024 Gene	10/7/2024	V	9/9/2024	10/1/2024	10/7/2024	N	N	N										REP	ROSS, ADAM M											N	N
PIN	106869196	43888	11/5/2024	2024 Gene	11/1/2024	P	9/9/2024	10/1/2024		N	N	N										NPA	SILBERMAN, MORRIS											N	N
PIN	107328057	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N										NPA	ST JOHN, SUSAN											N	N
PIN	106750378	43888	11/5/2024	2024 Gene	10/30/2024	V	9/9/2024	10/1/2024	10/30/2024	N	N	N										REP	STEARNS, JAMES R							astea				N	N
PIN	117723880	43888	11/5/2024	2024 Gene	10/21/2024	V	9/9/2024	10/1/2024	10/21/2024	N	N	N										REP	SULLIVAN, COURTNEY A							COU				N	N
PIN	106869683	43888	11/5/2024	2024 Gene	10/25/2024	V	9/9/2024	10/1/2024	10/25/2024	N	N	N										REP	TODD, KIMBERLY P							KIMP				N	N
PIN	113787368	43888	11/5/2024	2024 Gene	10/24/2024	V	9/9/2024	10/1/2024	10/24/2024	N	N	N										NPA	VILLANTI, CRAIG C							CCVI				N	N
PIN	106572664	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	WESTINE, LAURALEE G							lwest				N	N
PIN	106715884	43888	11/5/2024	2024 Gene	10/23/2024	V	9/9/2024	10/1/2024	10/23/2024	N	N	N										REP	WILLIAMS, AMY M											N	N
PIN	112888181	43888	11/5/2024	2024 Gene	10/27/2024	V	9/9/2024	10/1/2024	10/27/2024	N	N	N										NPA	ARROJO GNAGE, ANN KRISTEN I							karro				N	N
PIN	106835464	43888	11/5/2024	2024 Gene	10/23/2024	V	9/9/2024	10/1/2024	10/23/2024	N	N	N										REP	CARASSAS, JOHN							CARA				N	N
PIN	106876672	43888	11/5/2024	2024 Gene	10/23/2024	P	9/9/2024	10/1/2024		Y	N	Y										NPA	COLEMAN, SHERWOOD S											N	N
PIN	107374928	43888	11/5/2024	2024 Gene	10/31/2024	V	9/9/2024	10/1/2024	10/31/2024	N	N	N										REP	CROFF, DIANE M											N	N
PIN	106586554	43888	11/5/2024	2024 Gene	10/15/2024	V	9/9/2024	10/1/2024	10/15/2024	N	N	N										REP	FEDERICO, PHILIP J											N	N
PIN	121758410	43888	11/5/2024	2024 Gene	11/2/2024	V	9/9/2024	10/1/2024	11/2/2024	N	N	N										DEM	SILBERMAN, GABRIELLE C							GABI				N	N
PIN	115152501	43888	11/5/2024	2024 Gene	10/25/2024	V	9/9/2024	10/1/2024	10/25/2024	N	N	N	627	627	13	21	57	4	4	CCA,1 | FC	REP	ZUROWESTE, MARKS	105		OLI	FL	34677		z.din				N	N
PIN	106817356	43888	11/5/2024	2024 Gene	10/22/2024	V	9/9/2024	10/1/2024	10/22/2024	N	N	N	421	421	13	18	58	5	5	CCA,2 | CT	REP	JIROTKA, GEORGE M	112		BEL	FL	33786						N	N
PIN	125032393	43888	11/5/2024	2024 Gene	11/2/2024	V	9/9/2024	10/1/2024	11/2/2024	N	N	N	516	516	13	21	58	5	5	CCA,2 | CT	DEM	SMITH, LOUISE P	121		CLE	FL	33755						N	N
PIN	106815658	43888	11/5/2024	2024 Gene	10/26/2024	V	9/9/2024	10/1/2024	10/26/2024	N	N	N	516	516	13	21	58	5	5	CCA,2 | CT	DEM	BATTLE, MARLENA J	172		CLE	FL	33755						N	N
PIN	106772418	43888	11/5/2024	2024 Gene	10/18/2024	V	9/9/2024	10/1/2024	10/18/2024	N	N	N	632	632	13	21	57	4	4	CCA,1 | FC	REP	SIRACUSA, PAT	180		PAL	FL	34684		PATS				N	N
PIN	118836062	43888	11/5/2024	2024 Gene	10/30/2024	V	9/9/2024	10/1/2024	10/30/2024	N	N	N	622	622	13	21	57	4	4	CCA,1 | CT	DEM	VONDERHEIDE, EMILY A	181		OLI	FL	34677		emily				N	N
PIN	106862612	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N	530	530	13	21	57	4	4	CCA,2 | CT	REP	DESANTIS, KAREN A	183		DUI	FL	34698		kales				N	N
PIN	106862613	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N	530	530	13	21	57	4	4	CCA,2 | CT	REP	DESANTIS, RONALD D	183		DUI	FL	34698		DESA				N	N
PIN	106814594	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N	543	543	13	21	57	4	4	CCA,2 | FC	REP	HANDSEL, MARY M	188		PAL	FL	34683		mhar				N	N
PIN	107203835	43888	11/5/2024	2024 Gene	10/25/2024	V	9/9/2024	10/1/2024	10/25/2024	N	N	N	420	420	13	18	58	5	5	CCA,2 | CT	NPA	FRAYMAN, EVANG	200		IND	FL	33785		efray				N	N
PIN	106873787	43888	11/5/2024	2024 Gene	10/7/2024	V	9/9/2024	10/1/2024	10/7/2024	N	N	N	511	511	13	21	58	5	5	CCA,2 | CT	REP	STANLEY, BRYAN J	205		CLE	FL	33756		BRYA				N	N
PIN	107176725	43888	11/5/2024	2024 Gene	10/26/2024	V	9/9/2024	10/1/2024	10/26/2024	N	N	N	420	420	13	18	58	5	5	CCA,2 | CT	REP	SCHOLL, MARY J	220		IND	FL	33785						N	N
PIN	113659838	43888	11/5/2024	2024 Gene	11/4/2024	V	9/9/2024	10/1/2024	11/4/2024	N	N	N	155	155	14	18	60	6	6	CCA,3 | CT	REP	RAYBURN, JESSICAD	301		STI	FL	33702		jessi				N	N
PIN	123610805	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N	241	241	13	18	61	7	7	CCA,3 | CT	DEM	SERCUS, ELIZABETH A	310		STI	FL	33710		beth				N	N
PIN	124512657	43888	11/5/2024	2024 Gene	10/21/2024	V	9/9/2024	10/1/2024	10/21/2024	N	N	N	623	623	13	21	58	4	4	CCA,1 | CT	REP	WHITEHALL, BONNIEM	316		CLE	FL	33761						N	N
PIN	106873482	43888	11/5/2024	2024 Gene	10/21/2024	V	9/9/2024	10/1/2024	10/21/2024	N	N	N	636	636	13	21	57	4	4	CCA,1 | FC	REP	VINCENT, MELINDAL	319		PAL	FL	34685		VINC				N	N
PIN	107071730	43888	11/5/2024	2024 Gene	10/22/2024	V	9/9/2024	10/1/2024	10/22/2024	N	N	N	621	621	13	21	57	4	4	CCA,1 | CT	REP	CHRISTISON, TERESA J	384		OLI	FL	34677		TCHR				N	N
PIN	106881843	43888	11/5/2024	2024 Gene	11/3/2024	V	9/9/2024	10/1/2024	11/3/2024	N	N	N	244	244	13	18	61	7	7	CCA,1 | CT	REP	MCGIVERN, VALERIE B	485		KEN	FL	33705		kishk				N	N
PIN	125746368	43888	11/5/2024	2024 Gene	10/26/2024	V	9/9/2024	10/1/2024	10/26/2024	N	N	N	627	627	13	21	57	4	4	CCA,1 | FC	DEM	GALLATY, CONAN A	497		OLI	FL	34677		cgall				N	N
PIN	125836313	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N	627	627	13	21	57	4	4	CCA,1 | FC	DEM	GALLATY, NATASHAR	497		OLI	FL	34677		nrgal				N	N
PIN	107379308	43888	11/5/2024	2024 Gene	10/26/2024	V	9/9/2024	10/1/2024	10/26/2024	N	N	N	232	232	13	18	61	7	7	CCA,3 | CT	DEM	NGUYEN, ANN P	567		STI	FL	33710		annp				N	N
PIN	107001354	43888	11/5/2024	2024 Gene	10/24/2024	V	9/9/2024	10/1/2024	10/24/2024	N	N	N	144	144	14	18	60	6	6	CCA,3 | CT	REP	SCHORSCH, PETER D	573		STI	FL	33703		Saint				N	N
PIN	111125724	43888	11/5/2024	2024 Gene	10/31/2024	P	9/9/2024	10/1/2024		N	N	N	144	144	14	18	60	6	6	CCA,3 | CT	DEM	TODD SCHORSCH, ROBIN M	573		STI	FL	33703		rmicl				N	N
PIN	106735562	43888	11/5/2024	2024 Gene	10/15/2024	V	9/9/2024	10/1/2024	10/15/2024	N	N	N	222	222	13	18	61	7	7	CCA,3 | CT	DEM	POLSON, HERBERT E	614		STI	FL	33710		herbj				N	N
PIN	106739520	43888	11/5/2024	2024 Gene	10/15/2024	V	9/9/2024	10/1/2024	10/15/2024	N	N	N	222	222	13	18	61	7	7	CCA,3 | CT	DEM	POLSON, MARILYN M	614		STI	FL	33710		maril				N	N
PIN	107118442	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N	712	712	13	21	57	4	4	CCA,2 | CT	REP	WISMAN, STACY L	845		TAF	FL	34689		stacy				N	N
PIN	106730927	43888	11/5/2024	2024 Gene	10/29/2024	V	9/9/2024	10/1/2024	10/29/2024	N	N	N	254	254	13	18	61	6	6	CCA,1 | CT	NPA	HELINGER, JOHN J	890		SEN	FL	33777		jackh				N	N
PIN	106734148	43888	11/5/2024	2024 Gene	10/31/2024	V	9/9/2024	10/1/2024	10/31/2024	N	N	N	135	135	14	16	60	7	7	CCA,3 | CT	DEM	WILLIAMS, EMILY B	939		STI	FL	33701						N	N

EXHIBIT C:

Pinellas County Supervisors of Elections Office Hours

votepinellas.gov

Deadline to register to vote and/or change party affiliation: February 10, 2025

Deadline to request a ballot be mailed to you: February 27, 2025, at 5:00 p.m.

TRACK MY MAIL BALLOT

FIND MY POLLINGPLACE

Early Voting: Not conducted for municipal elections

Secure Mail Ballot Return Locations: One of our three offices

Election Day: March 11, 2025

Polls Open: 7:00 a.m. – 7:00 p.m.

Get Election Ready!

Request Sample Ballot

NEWS

HURRICANE RESPONSE

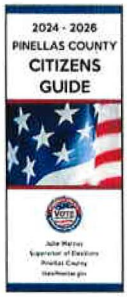
HURRICANE RESPONSE PAGE

For information on our hurricane response and election updates, visit our dedicated hurricane response page.

DATES TO REMEMBER

MARCH 11, 2025

MUNICIPAL ELECTIONS
Registration Deadline: February 10, 2025
Mail Ballot Request Deadline: February 27, 2025



DOWNLOAD THE PINELLAS COUNTY VOT CITIZENS GUIDE

The Voter Handbook includes an overview of voting i dates for upcoming elections, information on updatin information, how to request a mail ballot, what to ex or on Election Day and frequently asked questions. Th names and contact information of Pinellas County off

View 2024-25 Voter Handbook here
Vea el Manual de Votantes 2024-25 aquí

View the 2024-26 Citizens Guide here
Vea la Guía Para Ciudadanos 2024-26 aquí

The Florida Division of Elections also publishes a vote

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email:** Election@VotePinellas.gov | Public Records Request Form

P:(727) 464-VOTE (8683) • F:(727) 464-6239

Election Service Center
13001 Starkey Rd.
Largo, FL 33773
(Starkey Lakes Corporate Center)

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

County Building
501 First Avenue North
St. Petersburg, FL 33701
(Fifth Street North Entrance

F.S. 668.6076 Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. To submit a public re

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email:** Election@VotePinellas.gov | Public Records Request Form

P:(727) 464-VOTE (8683) • F:(727) 464-6239

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

ot want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by

June 2024

Add Holidays | More...

Save
sign in

Print

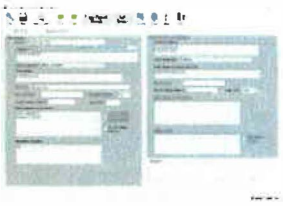
Sun	Mon	Tue	Wed	Thu	Fri	Sat
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

EXHIBIT D:

VR Systems: "Dialog: Process Web Vote-By-Mail Requests" (Protected Voter Display)

Process Web Vote-By-Mail Requests

To access: **Vote By Mail > Process Web Requests > {*request*}**



From this dialog, you can process a Vote-By-Mail Request submitted on your website into the voter's record. The election's status must be Active or Return Processing Only to process Vote-By-Mail Requests submitted on the web.

> **Note:** Once a Web Request has been processed (either by pressing **Save** or **Save and Print**), a row recording this activity will appear on the Comms tab of the affected voter's Voter Maintenance record. The Web Absentee Request communication will reflect the date the request was submitted, not the date it was processed.

If the voter has already voted—either by voting early, by in-office absentee, or by returning a mail ballot—you will see a message to that effect when you access the request. At that point you can either reject the request or process it manually. Either way removes it from the queue. No record of the rejection or decision to manually process the request is made on the voter's **Audit** tab.

If the election's status is not one of these, you will see a message to that effect and you should reject the request.

When you access a request, if you see messages indicating:

- the election's status is not Active or Return Processing Only

or

- the voter's precinct is not voting in the election

you should reject the request. No record will be made in the voter's record.

If the voter making the request is a Protected Voter, the program will hide the residence, mailing, and ballot addresses by displaying ****Protected****.

Toolbar

Save	Processes the request into the voter's record where it will appear on theirVote-By-Mail tab.

Process Manually	Removes the request from the queue. You have the option of printing a copy of the request to assist with manual processing. No record of the rejection is made on the voter's **Audit** tab.
Reject Request	Deny the request and remove the request from the queue. No record of the rejection is made on the voter's **Audit** tab.
Voters	Opens the voter's registration record.

Web Request

Election	*Display only field.* Shows *All Elections* or the name of the single election for which the voter requested a ballot.
Submitted Date	*Display only field.* The time and date when the request was submitted on the county website.
Residence	The residential address entered by the voter on the request form. It is informational only and is not copied to the voter's record.
Voter Classification	*Display only field.* Derived from the voter classification that the voter selects on the online form. This information will be copied to the voter's record. So for example, if a voter is not currently designated as Overseas or Military and they claim this classification on the online form (and provide a supporting overseas address if required for the classification they are claiming), the Overseas or Military flag will be set in their voter registration record when the Vote-By-Mail Request is processed.
Email Address	*Display only field.* If the voter provided an email address with their request, this field is copied to the Vote-By-Mail tab of the voter's record, overwriting any email address already there.
Signature	*Display only field.* The signature text entered by the person who submitted the request.

Phone Number	*Display only field.* The phone number, if the voter supplied one on their request. It is provided here for situations when you need to contact the voter about their request. This phone number is saved to the **View Web Absentee Request** dialog in the voter's record (not the **Telephone** field on the **Maint** tab). To access the **View Web Absentee Request** dialog, go to the **Comms** tab and double-click the entry marked **Web Absentee Request**.
Requested Delivery	*Display only field.* This field will display the voter's requested delivery method—**Mail**, **Email**, **Fax**, or **AcOnline**.
Driver's License/State ID	The voter's driver's license or state ID number, if entered on the request form.
Last 4 SSN	The last four digits of the voter's Social Security Number, if entered on the request form.
Ballot Address for this Election *Displayed if voter requested ballot for one election only.* **Ballot Address for All Elections** *Displayed if voter requested ballots for all elections.*	On the online Absentee/Mail Ballot Request form, the voter selected the option **I wish to receive my ballot(s) at the address designated below** and provided an address in the fields provided when this option is selected. Unless you select one of the two check boxes, processing the request will copy the address to the Vote-By-Mail Addresses dialog in the voter's record: For single election requests, the address is copied to the **Ballot Addressfor this Election** fields. For all-elections requests, the address is copied to the **Default Ballot Address** fields. If you want to modify this address, click in the box to open a dialog for editing.

Same as Mailing Address (Do not update address)	This check box is selected automatically when the mailing address on the request is identical to the mailing address in the voter's record. It prevents the processing program from updating the voter's mailing address with the ballot address entered on the web form. You would manually select this check box if you think the mailing address on record is more accurate than the one the voter submitted—for example, if the address in the request has spelling errors. When this check box is not selected, saving the request saves the address in this field to the **Ballot Address for This Election** (if the request is for a single election) or the **Default Ballot Address** (if an all-elections request) in the voter's record.
Move to Mailing Address	Select to have the address provided by the voter copied to the mailing address in the voter's record.
Requester Information	Indicates whether the request was made by the voter (Self) or another person who is a family member or legal guardian of the voter (Requester). For a *Requester* (person other than the voter), the information that displays is the requester's name, address, relationship to voter, and when provided in the MBRS request, the last four digits of the requester's Social Security Number or driver license/state ID number. To modify the requester information, click in the box to open a dialog for editing. You can also view and edit the requester information from the Vote-By-Mail tab > Mail-Ballot Adjustments > Maintain Requester Information dialog in the voter's record.

UOCAVA Address Provided by Voter	If the voter requested a delivery method other than mail, this address was required on the web request to validate that the voter has UOCAVA status. Any address displayed here will be discarded when you save the request unless you select the **Move to Mailing Address** field next to the UOCAVA address, which will overwrite the mailing address on the voter's record. If you want to modify this address, click in the box to open a dialog for editing.
Move to Mailing Address	Copies the address in the **UOCAVA Address Provided by Voter** field to the voter's mailing address.

Information from the Voter's Existing Record

Voter's Residence Address	*Display only field.* The residential address in the voter's record. If the voter provided a different residential address on the web request, it will not be copied to the voter registration record.
Voter Classification	*Display only field.* Derived from the **Military**and **Mil Dep** fields in the voter's record.
Email Address (on Vote-By-Mail Tab)	*Display only field.* If the voter provided an email address on a previous request and it is present on theVote-By-Mailtab of their record, it will be shown here. If they provided an email address on the current web request, it will be copied to the **Email** field on their **Vote-By-Mail** tab, overwriting any email address already there.
Phone Number	*Display only field.* The phone number from the voter's record. If the voter entered a phone number on the web request, it is not copied to their record.

Driver's License/State ID	The voter's driver's license or state ID number, if entered in the voter's record.
Last 4 SSN	The last four digits of the voter's Social Security Number, if entered in the voter's record.
Ballot Address for This Election *(single election requests)* **or** **Default Ballot Address** *(all-elections requests)*	*Display only field.* If the voter already has a request for this election, this field displays the ballot address for this election, if one exists on the Vote-By-Mail Addresses dialog in their record. If the voter has a default ballot address on the **Vote-By-Mail Addresses** dialog, it will be displayed here.
Mailing Address	*Display only field.* If the voter has a mailing address, it will be displayed here.
Clear Mailing Address	Select if you want to remove the existing mailing address from the voter's record when you click **Save** to process the request.
Remarks	If the voter already has a request for the election or they are ineligible, the system will note it here. You can edit this field with additional comments, if you like. The contents of this field are saved to the **Remarks** field on the **View Web Absentee Request** dialog in the voter's record. To access this dialog, go to the **Comms** tab and double-click the entry marked **Web Absentee Request**.

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EXHIBIT E:

VR Systems: "About Data Files Sent to FVRS by Voter Focus")

Data Files Sent to FVRS by Voter Focus

This topic describes the files Voter Focus automatically sends to the State system. Files are automatically sent by Voter Focus which runs automatically after midnight every day and for every two hours thereafter.

Daily Election Files

Counties are required to prepare and transmit to the State three files pertaining to voting by mail and early voting in an election. The Absentee Ballot Request Information file must be sent daily beginning 70 days before an election and for 15 days after the election. The two early voting files (Early Voting Summary and Early Voting Voters List) are sent each day beginning the first day of early voting and for three days after the end of early voting.

Each daily election file is a complete report of voting in the election so far; they overwrite the daily files sent previously.

The three files are transmitted automatically by the Voter Focus program Send Public Files, which runs automatically after midnight every day and for every two hours thereafter. If one or more of these files have not been sent to the State by 8 am during the reporting period, you will see a Send Public Files alert in VR Dashboard (and will receive an email if Alerts Maintenance is set up to send emails for the Send Public Files alert).

- **Vote-By-Mail Ballot Request Information File**—Lists county voters who have requested a mail ballot for an election, the status of the request, and other relevant data. Protected voters will be included in these files, with sensitive information such as address, precinct, and district redacted.

  Note: In the Candidate File Distribution portal, this file is known as the County Mail Ballot Status File.

  This file is automatically created and sent to FVRS daily (overnight) beginning 70 days prior to an election and ending on the 15th day after the election. If a general election is preceded by a primary, a separate file is sent for each election.

  The file contains information processed up to close of business on the day prior to the overnight run. Each daily file contains all Vote-By-Mail voters to date, not just new additions. It can contain Vote-By-Mail data for multiple elections. A copy of each file sent to the state is placed in \Vr6Sharedbinaries\FVRSUpload. The file name is *<county code>_VBM_<FVRS election number>_<date of run>_<time of run>*.

  Contents of the file, reading left to right:

Header	Description	Format
RecordType	Vote-by-Mail ballot request status	VBM
CountyID	County providing summary	Char (3) — FVRS code
Voter IdNumber	Voter ID number	Numeric (10)
ElectionNumber	Election identifier	Numeric (10)
ElectionDate	Date of the election	MM/DD/YYYY
ElectionName	Name of election	Char (35)
LastRecordChangeDate	Date the vote-by-mail summary record was last updated	MM/DD/YYYY
VoteByMail	C—Canceled by the voter or the voter moved out of county before the ballot was provided to voter E—Voter error or eligibility issue L—Returned untimely N—Unsigned (no signature provided on certificate or affidavit) P—Provided by any proper means of delivery R—Requested (this election) S—Standing (all elections) U—Returned undeliverable V—Returned and voted timely X—Mismatched signature on the certificate or affidavit	Char (1)
RequestDate		MM/DD/YYYY

Header	Description	Format
DeliveryDate		MM/DD/YYYY
BallotReturnDate	Overseas ballots received during the 10-day period after Election Day for a presidential preference primary or general election shall be recorded with a return day of Election Day if the ballot counted.	MM/DD/YYYY
RequestCanceledDate		MM/DD/YYYY
Military		Char (1) Y, N
OverseasFlag		Char (1) Y, N
MilitaryDependent		Char (1) Y, N
Precinct		Char (6)
PrecinctSplit		Char (10)
CongressionalDistrict		Numeric (2)
SenateDistrict		Numeric (2)
HouseDistrict		Numeric (3)
CountyCommissionDistrict		Char (10)
SchoolBoardDistrict		Char (10)
OtherDistricts		Char (25)
Party		Char (3)
VoterName		Char (99)
MailingAddressLine1		Char (40)
MailingAddressLine2		Char (40)
MailingAddressLine3		Char (40)
MailingAddressCity		Char (40)
MailingAddressState		Char (2)
MailingAddressZip		Char (15)
MailingAddressCountry		Char (40)
EmailAddress		Char (100)
FaxNumber		Char (20)
DesigneeNameRequest	Designee, who can only be voter's immediate family or legal guardian, making request on behalf of voter	Char (99)
DesigneeNamePickup	Designee, who may be someone other than immediate family, picking up ballot for voter	Char (99)
Voter FLDL/StateID	Y = information was provided; N = information was not provided **Note**: This value can come from MBRS or the ID type selection on the Vote By Mail Request or Maintain Requester Information dialog.	Char (1)
VoterSSN4	Y = information was provided; N = information was not provided **Note**: This value can come from MBRS or the ID type selection on the Vote By Mail Request or Maintain Requester Information dialog.	Char (1)

Note: The absentee request status S denotes voters who have a standing request, while R denotes voters who requested a ballot for this election only. When Vote-By-Mail requests are generated for all elections voters, all S voters who are eligible to vote in the election will subsequently appear twice in the Vote-By-Mail Ballot Request Information File: once with the S status and again with the R status. Any all-elections/FPCA voters who are not

eligible to vote in the election with only be listed once—with the S status. Those voters will not be listed again with an R status, since they will not receive a ballot.

Note: In order for the requests status *N—No signature* to be reported in the Vote-By-Mail Ballot Request Information File for no signature referrals, the option **"No Signature" Reason** must be selected in System Codes **> Vote-By-Mail Referral Reasons** for every no signature referral reason.

- **Early Voting Voters List**—Lists county voters who have early voted in an election to date. This file is automatically created and sent to FVRS daily beginning the first day of early voting and for three days after the end of early voting. If multiple elections have early voting in progress on a given day, a separate file for each election is sent to FVRS. A copy of each file sent to the state is placed in \Vr6Sharedbinaries\FVRSUpload. The file name is *<county ID>*_EVL_*<FVRS election number>*_*<date of run>*_*<time of run>*.

  Contents of the file, reading left to right:

County ID	FVRS Election number	Election date
Election name	Voter registration ID	Voter name
Precinct	Party	Voter's early voting location
Date voter early voted		

Voting History File

EViD Get Out the Vote Report

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EXHIBIT F:

VR Systems: "How to Process Received Mail Ballot Requests"

Process Mail Ballot Requests Received

Vote-by-mail requests submitted via the Mail Ballot Request Service are sent to the Web Vote-by-Mail Request Queue in Voter Focus. This eliminates the need to rekey the information from the request forms into voter records. All that's required is to check the web request and give Voter Focus the go-ahead to insert it into the voter's record.

> **Note:** Mail ballot requests that require the voter to complete an affidavit because they chose to have the mail ballot delivered to a new address that is not currently on file with FVRS do not appear in the Web Vote-by-Mail Request Queue in Voter Focus to prevent premature data-entry.

Your county will also receive an email for each voter who has submitted a mail ballot request online. An email is not sent if the voter is required to complete an affidavit.

The email address submitted by the voter will be stored in the **E-Mail** field on the voter's **Vote-by-Mail** tab, replacing any previously entered email address. (These emails are not considered public record.)

For a list of the voters who have submitted web requests that have not yet been processed, run the Pending Web Absentee Requests report.

Processing a request from the website creates an entry on the voter's **Comms** tab called **Web Absentee Request**. Double-click this entry to see a summary of the request on the **View Web Absentee Request** dialog.

> **Note:** An entry is not made on the voter's Comms tab if the voter is required to complete an affidavit.

For more information about the processing of web requests, see Process Vote-by-Mail Requests Submitted on Your Website in the Voter Focus Help system.

For mail ballot requests that required an affidavit to returned, when the affidavit is received by your office, you can manually enter the vote-by-mail request. For more information see the following topics in the Voter Focus help system:

- Mail Ballot Request for a Specific Election
- Mail Ballot Request for All Elections
- Mail Ballot Request for Several Elections

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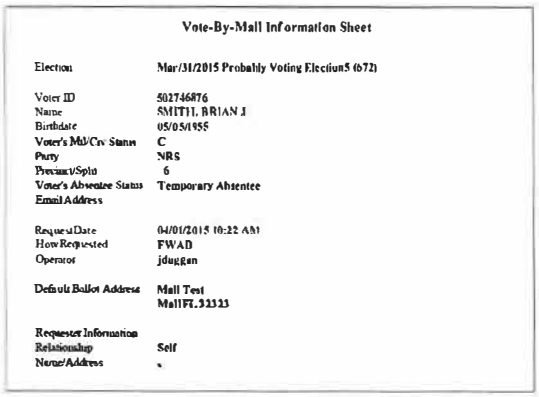
Vote-By-Mail Information Sheet

You have the option of printing this document when processing a Vote-By-Mail request or an in-office or pickup absentee from the Vote-By-Mail Request and Voting Election dialogs. The sheet prints to your default printer.



Vote-By-Mail Information Sheet

Election	Mar/31/2015 Probably Voting Election5 (672)
Voter ID	502746876
Name	SMITH, BRIAN J
Birthdate	05/05/1955
Voter's Mil/Civ Status	C
Party	NRS
Precinct/Split	6
Voter's Absentee Status	Temporary Absentee
Email Address	
Request Date	04/01/2015 10:22 AM
How Requested	FWAD
Operator	jduggan
Default Ballot Address	Mail Test Mail FL 32323
Requester Information	
Relationship	Self
Name/Address	

Print

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EXHIBIT G:

Second District Court of Appeal Judge Roster

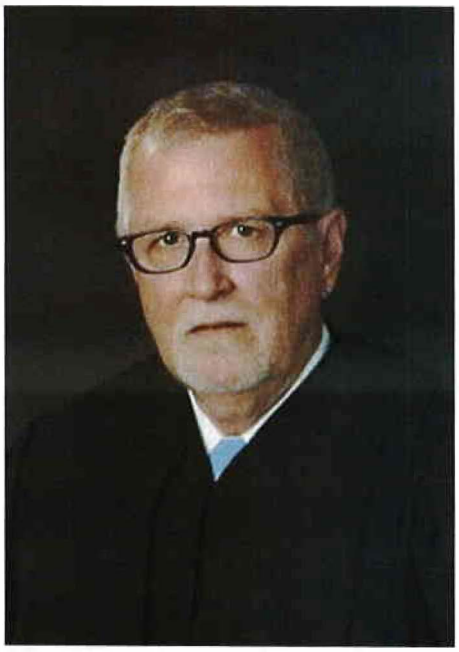
FLORIDA
SECOND DISTRICT COURT OF APPEAL

ACCESSIBLE | FAIR | EFFECTIVE | RESPONSIVE | ACCOUNTABLE

Second District Court of Appeal Judges

For more information about a judge, click on the judge's name.

Chief Judge Daniel H. Sleet
Years of Service: 2012 - Present



Judge Stevan T. Northcutt

Years of Service: 1997 - Present

Judge Morris Silberman

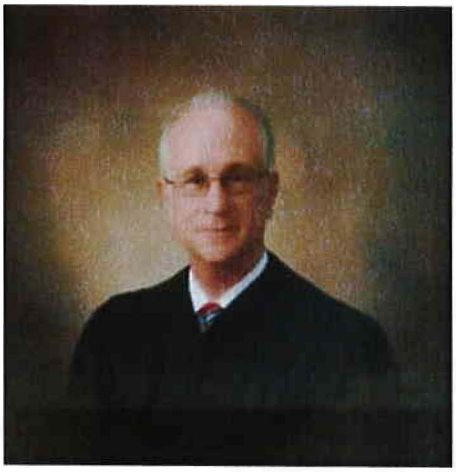
Years of Service: 2001 - Present

Judge Patricia J. Kelly
Years of Service: 2001 - Present

Judge Craig C. Villanti
Years of Service: 2003 - Present

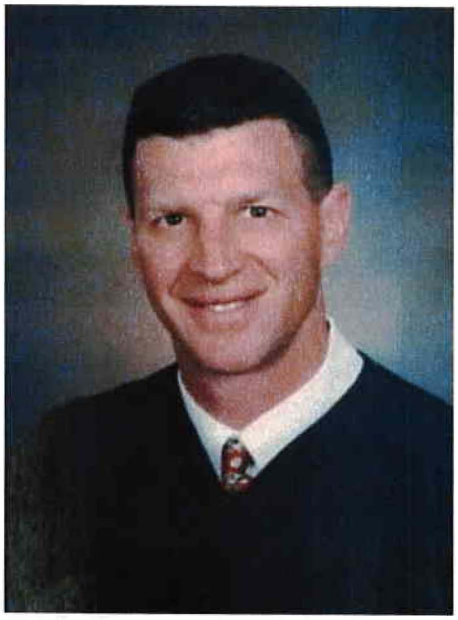
Judge Edward C. LaRose
Years of Service: 2005 - Present

Judge Nelly Khouzam
Years of Service: 2008 - Present



Judge Robert Morris

Years of Service: 2009 - Present



Judge Anthony K. Black

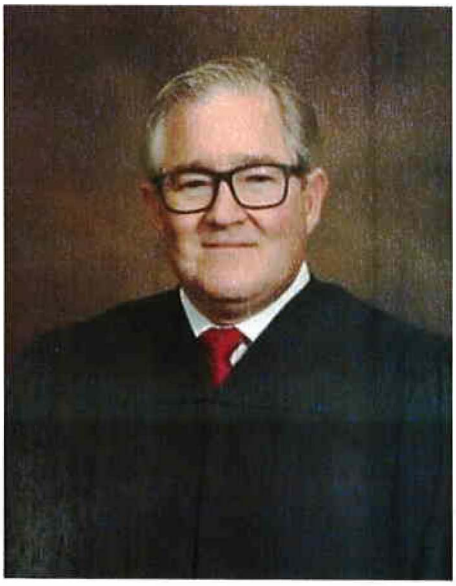
Years of Service: 2010 - Present

Judge Matthew C. Lucas

Years of Service: 2014 - Present

Judge Susan H. Rothstein-Youakim

Years of Service: 2016 - Present



Judge J. Andrew Atkinson

Years of Service: 2018 - Present

Judge Andrea Teves Smith

Years of Service: 2019 - Present

Judge Suzanne Labrit
Years of Service: 2020 - Present

Judge Anne-Leigh Gaylord Moe
Years of Service: 2025 - Present

Judges

Chief Judge Daniel H. Sleet

Judge Stevan T. Northcutt

Judge Morris Silberman

Judge Patricia J. Kelly

Judge Craig C. Villanti

Judge Edward C. LaRose

Judge Nelly Khouzam

Judge Robert Morris

Judge Anthony K. Black

Judge Matthew C. Lucas

Judge Susan H. Rothstein-Youakim

Judge J. Andrew Atkinson

Judge Andrea Teves Smith

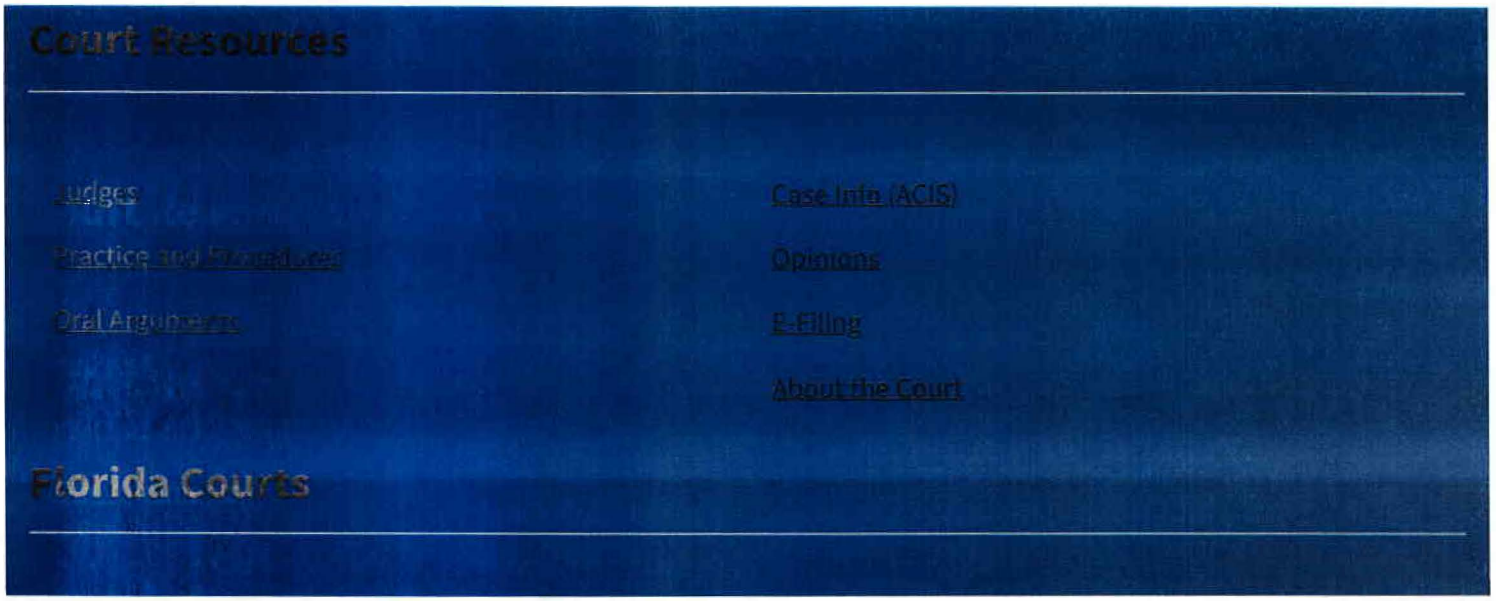
Judge Suzanne Labrit

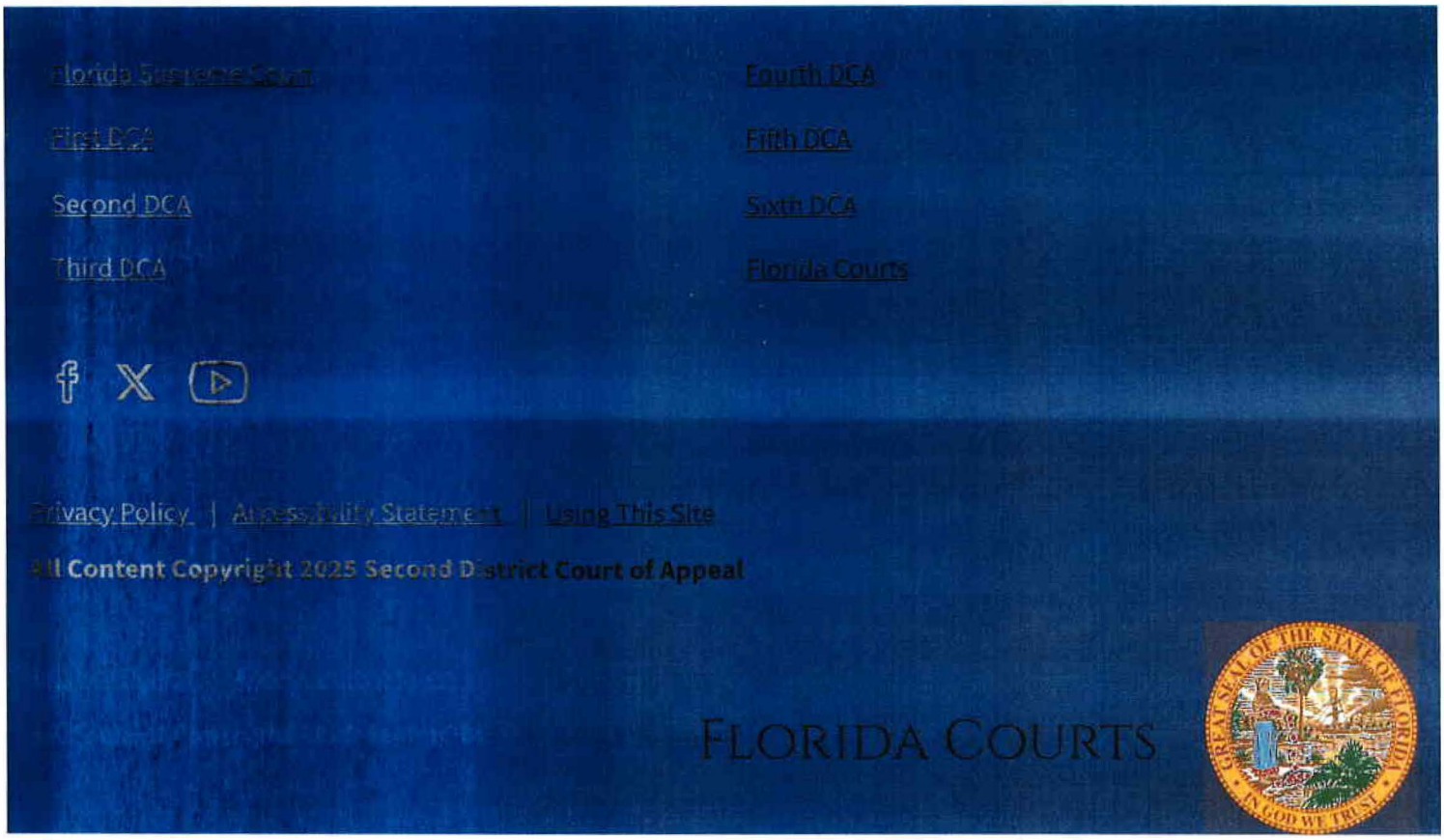
Judge Anne-Leigh Gaylord Moe

Former Judges

Current Judges

View a larger version of the photo




Florida Supreme Court
First DCA
Second DCA
Third DCA
Fourth DCA
Fifth DCA
Sixth DCA
Florida Courts
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FLORIDA COURTS

EXHIBIT H:

Affidavit of John Siamus (April 7, 2025)

AFFIDAVIT OF JOHN SIAMAS

REGARDING CHAIN OF CUSTODY FOR STATEWIDE VOTE BY MAIL

REPORTS AND THE IRREGULARITES OBSERVED WITH THE DATA

STATE OF FLORIDA)
) ss:
COUNTY OF PINELLAS)

Before me, the undersigned authority, personally appeared John Siamas, who, being duly sworn, states as follows:

Affiant's Identity

1. I, John Siamas, was a Republican candidate for the Florida State Sente District 21 Primary Election held on August 20th, 2024. I am over 18 and competent to make this affidavit and have personal knowledge of the facts stated herein.

Purpose of Affidavit:

2. This affidavit is made to establish the chain of custody for the Statewide Vote-By-Mail Report ("VBM") that I obtained directly from the Florida Division of Elections at the following url:

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports

Acquisition of Voting List:

3. I personally accessed the Florida Division of Elections secure online system for authorized individuals as clearly stated in FL Stat 101.62 and FAC 1S-2.043. I used the following secure URL

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports

provided to me by the Division of Elections to download the daily updates of the Statewide Vote-By-Mail Early Voting List.

Secure Download Process:

4. The Florida Division of Elections provided me access to the Voting List via the following secure link

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports ,

which required my unique login credentials provided by the Division. These credentials were assigned specifically for my use as a registered recipient of the Voting List after directly registering with the State at the following url:

https://countyballotfiles.floridados.gov/Account/Register

Receipt of Voting List:

5. Upon logging into the secure platform, I downloaded the Vote-By-Mail report, which was provided in .txt and/or .zip format. I saved the downloaded files directly to my computer under secure conditions, ensuring that the data was not altered.

Handling and Storage:

6. After downloading the Vote-By-Mail report, I took immediate steps to preserve the integrity of the data. The files were securely stored on my computer, which is protected by encryption and password protection. No unauthorized individuals had access to the Voting List from the time I downloaded it until it was submitted in connection with this case.

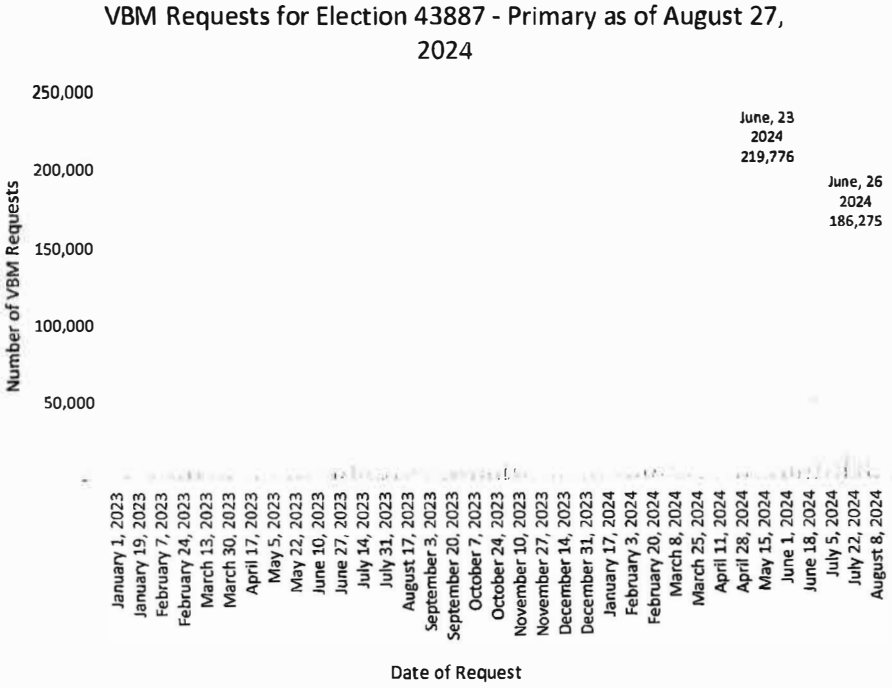
Integrity of the Data:

7. I affirm that the Voting List downloaded from the Florida Division of Elections has not been altered, modified, or tampered with in any way. The files I obtained are in the same condition as when I downloaded them directly from the Division's secure platform.

Irregularities and Anomalies with the Vote-By-Mail Ballots

8. Here are the following anomalies and irregularities in the vote-by-mail ballots and the system implemented to administer the vote-by-mail ballots:

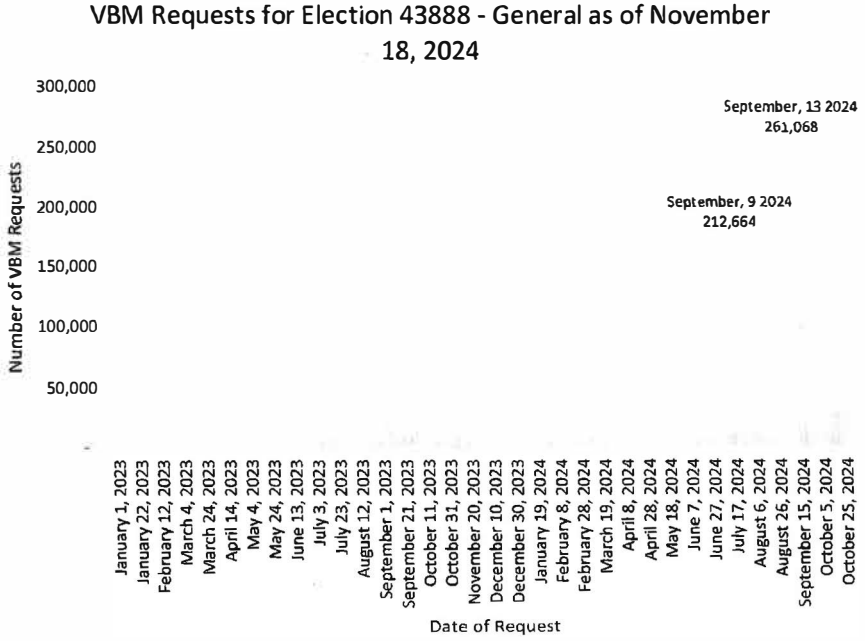
(1) When observing the vote-by-mail ballot (VBM) request data as of August 27, 2024, provided by the Florida Division of Elections for the primary elections, I noticed two very unusual outliers in the requests made. Here is a visualization of the daily requests made across the entire state in 2024:



(2) The two extreme outliers represent two dates, Sunday June 23, 2024, and Wednesday June 26, 2024. The number of vote-by-mail ballot requests made on June 23, 2024, was 219,776. The number of vote-by-mail ballot requests made on Wednesday June 26, 2024, was 186,275. The following is a factual analysis of these anomaly for the county of Pinellas:

a. On Sunday June 23, 2024, of the total 219,779 vote-by-mail ballot requests made, 219,675 vote-by-mail ballots requested were made from the Pinellas County Supervisor of Elections office. Of those 219,675 vote-by-mail requests from Pinellas County, according to the VBM Report dated August 27, 2024, provided by the State, 219,628 (99%) did not provide a Driver's License or Last 4 of SSN as part of the request. This is indicated by a "N" designator in the columns for the "FLDL/StatelD" and "VoterSSN4" in the report.

(3) When observing the vote-by-mail ballot (VBM) request data as of November 18, 2024, provided by the Florida Division of Elections for the general elections, I again noticed two very unusual outliers in the requests made. Here is a visualization of the daily requests made across the entire state in 2024:



(4) A The two extreme outliers represent two dates, Monday September 09, 2024, and Friday September 13, 2024. The number of vote-by-mail ballot requests made on September 09, 2024, was 212,664. The number of vote-by-mail ballot requests made on September 13, 2024, was 261,068. The following is a factual analysis of this anomaly for the county of Pinellas:

a. On Monday September 09, 2024, of the total 212,664 vote-by-mail ballot requests made, 196,037 vote-by-mail ballots requested were made from the Pinellas County Supervisor of Elections office. Of those 196,037 vote-by-mail requests from Pinellas County, according to the VBM Report dated November 18, 2024, provided by the State, 195,280 (99%) did not provide a Driver's License or Last 4 of SSN as part of the request. This is indicated by a "N" designator in the columns for the "FLDL/StatelD" and "VoterSSN4" in the report.

9. The following is a list of Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in both the Primary and General Elections per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judge	Campbell, Kim	107167732
Pinellas 6th Circuit Judge	Campbell, Pamela A	106758700
Pinellas 6th Circuit Judge	Coleman, Sherwood	106876672
Pinellas 6th Circuit Judge	Gnage, Brian	107285314
Pinellas 6th Circuit Judge	Handsel, Mary M.	106814594
Pinellas 6th Circuit Judge	Jirotka, George M.	106817396
Pinellas 6th Circuit Judge	Loar, Doneene	107338189

Pinellas 6th Circuit Judge	Matthey, Philippe	107385240
Pinellas 6th Circuit Judge	Moore, Patrice	106958587
Pinellas 6th Circuit Judge	Muscarella, Patricia A	106784723
Pinellas 6th Circuit Judge	Newton, Cynthia J	107071107
Pinellas 6th Circuit Judge	Ramsberger, Thomas M	107143704
Pinellas 6th Circuit Judge	Riba, Joshua	106991733
Pinellas 6th Circuit Judge	Siracusa, Pat	106772419
Pinellas 6th Circuit Judge	Todd, Kimberly	106869683
Pinellas 6th Circuit Judge	Westine, Lauralee G	106972664
Pinellas 6th Circuit Judge	Helinger, Jack	114340336

10. The following is a list of Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judge	Federico, Philip J.	106986554
Pinellas 6th Circuit Judge	Pearlman, Nicole	100554220
Pinellas 6th Circuit Judge	Stearns, James R	106750878
Pinellas 6th Circuit Judge	Williams, Amy M	106715884

11. The following is a list of Judicial Assistants for Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in both the Primary and General Elections per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judge Judicial Assistant for Judge Steve Berlin	Vincent, Melinda	106873482
Pinellas 6th Circuit Judge Judicial Assistant for Judge Kim Campbell	Hughes, Cyndi	106941212
Pinellas 6th Circuit Judge Judicial Assistant for Judge Pamela Campbell	Miele, Joann	106945217
Pinellas 6th Circuit Judge Judicial Assistant for Judge Elizabeth Jack	Leis, Amber	117384460
Pinellas 6th Circuit Judge Judicial Assistant for Judge Philip J. Federico	Psenisky, Jill	106978328
Pinellas 6th Circuit Judge Judicial Assistant for Judge Jack Hellinger	Scholl, Mary	107176725
Pinellas 6th Circuit Judge Judicial Assistant for Judge Patricia Moore	Trosky, Raelynn	107145889
Pinellas 6th Circuit Judge Judicial Assistant for Judge Shawn Crane	Smith, Louise	125032393
Pinellas 6th Circuit Judge Judicial Assistant for Judge Daniel D Diskey	Debi McCarty	107067204
Pinellas 6th Circuit Judge Judicial Assistant for Judge David Ellis	Wisman, Stacy	107118442
Pinellas 6th Circuit Judge Judicial Assistant for Judge George M Jirkota	Whitehall, Bonnie	124912657
Pinellas 6th Circuit Judge Judicial Assistant for Judge Thomas M Ramsberger	McGivern, Valerie	106981943
Pinellas 6th Circuit Judge Judicial Assistant for Judge Julie L Sercus	Rayburn, Jess	113659838

12. The following is a list of Judicial Assistants for Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State:

Title	Name	Voter ID
Pinellas 6th Circuit Judge Judicial Assistant for Judge Joseph Bulone	Nguyen, Annie	107054797

13. The following is a list of Relatives to the Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Relative of Judge Julie L Sercus	SERCUS, ELIZABETH A	123610805
Relative of Judge Julie L Sercus	SERCUS, FAITH A	111895803

14. The following is a list of County Judges of the Sixth Judicial Circuit of Florida and their Assistants, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judicial County Judge	Carassas, John	106835464
Pinellas 6th Circuit Judicial County Judge	Jagger, Edwin	106832762
Pinellas 6th Circuit Judicial County Judge	Pierce, James	106815101
Pinellas 6th County Judicial Assistant for Judge Edwin Jagger	Hall, Michelle	106720023

Pinellas 6th County Judicial Assistant for Judge Theodora Komninos	Masterson, Vicki	107150747
Pinellas 6th County Judicial Assistant for Judge Kelly Lorraine	Caffentzis, Joan	106926631
Pinellas 6th County Judicial Assistant for Judge Cathy McKyton	Nierengarten, Cheryl	107033524

15. The following is a list of the Florida Second District Court of Appeal Judges and their relatives, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
2nd DCA	Silberman, Morris	106869196
2nd DCA	Villanti, Craig C	113787369
2nd DCA	Khouzam, Nelly	106723453
Relative of Judge Matthew C Lucas of the 2ND DCA	Lucas, Cheryl L	107285166
Relative of Judge Susan H Rothstein-Youakim of the 2ND DCA	Rothstein, Rita M	122458841
Relative of Judge Susan H Rothstein-Youakim of the 2ND DCA	Rothstein, Arthur S	122246266

16. The following is a list of the Florida Supreme Court Judges, their assistants, and their relatives, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Supreme Court of Florida	Couriel, John D	117954867
Judicial Assistant to Supreme Court Judge Charles Canady	Williams, Brenda	109108119
Relative of Judge Jorge Labarga	Labarga, Maria A	110265650

17. The following is a list of Senior Assistant Pinellas County Attorneys in Pinellas County, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Senior Assistant Pinellas County Attorney	Sadowsky, David	106906875
Senior Assistant Pinellas County Attorney	Sanzeri, Carole	106790228
Senior Assistant Pinellas County Attorney	Schaefer, John	106839614
Senior Assistant Pinellas County Attorney	Ester, Jason	107005833
Senior Assistant Pinellas County Attorney	LeBlanc, Christina	107056302
Senior Assistant Pinellas County Attorney	Morrissey, Joseph	125661447
Senior Assistant Pinellas County Attorney	Steg, Betsy	106931757

18. The following is a list of Assistant County Attorneys and County Attorneys in Pinellas County, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM

Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Assistant County Attorney	Barrera, David	118419022
Assistant County Attorney	Kahn, Jared	111191787
Assistant County Attorney	Klein, Jeffrey	106650848
Assistant County Attorney	Lewis, Kelly	125247381

Title	Name	Voter ID
County Attorney	White, Maria	107153397

19. The following is a list of State Attorney for the Sixth Judicial Circuit of Florida Pinellas County and their relatives, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	Bruce, Robert	107387209
State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	Williams, Emily	107417811
Division Directory for the Sixth Judicial Circuit of Florida Pinellas County	Sullivan, Courtney	117723880
Division Directory for the Sixth Judicial Circuit of Florida Pinellas County	Koskinas, Thomas	107203473
Division Directory for the Sixth Judicial Circuit of Florida Pinellas County	Hill, Karen	106808845
State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	Festa, Noelle	107125137

Relative of Nathan Vonderheide State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	VONDERHEIDE, EMILY A	119836062
Relative of Noelle Festa State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	FESTA, THOMAS V	114538517

20. The following is a list of other significant individuals, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Relative of Pinellas County Sheriff Robert Gualtiere, Judge Lauralee G Westine	WESTINE, LAURALEE G	106972664
Supervisor of Election Pinellas County	Marcus, Julie	107075643
County Commissioner on Canvassing Board	POLSON, HERBERT E	106735562
County Commissioner on Canvassing Board	PETERS, KATHLEEN M	106894092

[AFFIANT SIGNATURE]

Sworn to and subscribed before me by means of X physical presence or _____ online notarization, this 7th day of April 2025 John Siamas

Notary Public – State of Florida

Notary Public State of Florida
Ethan Weaver
My Commission HH 432294
Expires 8/10/2027

Ethan Weaver
[PRINT, TYPE, OR STAMP NAME OF NOTARY PUBLIC]

Personally Known _____ OR Produced Identification X [CHECK ONE]

[Type of Identification Produced: [COMPLETE ONLY IF NOTARY REQUESTED IDENTIFICATION]] FL DL

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Google Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Select Language

Powered by Google Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Last Name:

Siamas

Date of Birth:

[redacted]

House Number of Voter's Residence Address:

[redacted]

Last Four Digits of SSN:

[redacted]

OR

Driver's License (or State ID) Number:

[redacted]

Search

Back

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email: Election@VotePinellas.gov (mailto:election@votepinellas.gov) | Public Records Request Form (/General-Information/Contact-Us/Public-Record-Request)**

P:(727) 464-VOTE (8683) • F:(727) 464-6239

Election Service Center
13001 Starkey Rd.
Largo, FL 33773
(Starkey Lakes Corporate Center)

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

County Building
501 First Avenue North
St. Petersburg, FL 33701
(Fifth Street North Entrance)

F.S. 668.6076 Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. To submit a public records request, use this form. (/General-Information/Contact-Us/Public-Record-Request)

EXHIBIT I:

VR Systems Manual: “Dialog: Vote-By-Mail Request”

Vote-By-Mail Request

To access: **VOTER REGISTRATION > Voter Maintenance > {*voter*} > Vote-By-Mail** tab **> New Request** or **All Elections** or **Federal Post Card App**

or

Vote-By-Mail > Vote-By-Mail Request > {voter}

On the **Vote-By-Mail Request** dialog you can:

Record a voter's request(s) for mail ballots.

Maintain addresses where mail ballots are to be sent.

The "state" of this dialog depends on whether you are making a single request, an all-elections request, an FPCA request, or a request for all elections through a specific date range. The type is shown in the **Request Type** box and, in the case of the All Elections and FPCA types, all elections for which the voter is eligible will be selected. For a single request or a request for several specific elections, you will need to select the **Request** field for each election where the voter wants a mail ballot.

The box in the center of the dialog lists the elections whose status is Open, Active, or Return Processing Only, showing the voter's Vote-By-Mail status for each election. A blank status indicates the voter is eligible to vote in the election but has not requested a mail ballot. When you first access the dialog, the requests are sorted by election date with the most future election first. To sort by another criterion, click the column heading of the column you want to sort by.

The buttons in the **Change Address** column let you add a default ballot address (if used by your county) or a Ballot Address for This Election. Double-click an **Add Address** or **Change Address** button to open the Vote-By-Mail Addresses dialog where you can add or update an address. Note that if you change the Default Ballot Address for one request, it changes this address for all requests. The Ballot Address for This Election is for the selected request only.

Fields and Controls on this Dialog

Save — Saves the request without printing an address label or Vote-By-Mail Information Sheet. If you want to print these documents, click **Save and Print** instead.

Save and Print — Saves the request and prints a Vote-By-Mail Information Sheet to your default printer. You can use this document to verify the correct information was entered into the database. Some counties attach the sheet to the Vote-By-Mail Request, if a paper request is available.

If the **How Requested** field is a pick-up value (Pick-up or 3rdParty) and your Voter Focus system is set up for printing labels (**VOTER FOCUS ADMIN > System Options > Vote By Mail > Vote-By-Mail Label Options**), clicking **Save and Print** also prints an address label with a bar code to your label printer. You can affix the label to the return envelope.

Utilities > Local Printer Options — Opens the Local Printer Options dialog where you can select a label printer and page printer for your workstation.

Default Ballot Address — Opens the Vote-By-Mail Addresses dialog where you can enter addresses to which ballots should be sent other than the voter's mailing or residence address.

Vote-By-Mail Status

Permanent—A voter who is expected to Vote By Mail indefinitely. This status is typically used for voters who have asked to receive the annual Notice of Elections each year.

This status allows voters to request mail ballots for all or select elections held through the end of the calendar year of the next regularly scheduled general election.

Temporary—A voter who wants to Vote By Mail in one or more elections but who has not asked to receive the annual Notice of Elections. The Voter Focus administrator has the option of resetting the absentee status of Temporary voters to Cancelled at the end of an election year. (See Clear Temporary Vote-By-Mail Statuses.)

Cancelled (or no status selected)—The voter has no mail ballot requests in their record.

FPCA Applicant—A mail ballot voter who has requested ballots using the Federal Post Card Application form. The FPCA form allows military voters, their dependents, and civilian voters residing outside the United States to make a single request for mail ballots through the end of the calendar year of the next regularly scheduled general election held after the request date unless the voter indicates a shorter time period or a specific election in which they want to vote.

Note:

An upcoming general election is not considered the *next general election* if the all elections request is submitted after 5:00 pm of the 6th day prior to the upcoming election date.

The voter's *FPCA Applicant* status does not remain in their voter registration record should they change their residence to another county. If the voter wants to maintain FPCA status, they will need to submit another FPCA form to the elections office in their new county.

The *FPCA Applicant* status reverts to a blank status when the FPCA request expires at the end of the calendar year.

Comment — A 25-character field for user notes. Should you need more space than the 25 characters provided, type *See Communication Log* in the **Comment** field. Then go to the voter's record and create an office note.

Some counties use this field to record the voter's phone number when the voter has asked that the number not be included in their voter registration record. In such cases, the phone number is omitted from the **Telephone** field on the voter's **Maint** tab and entered into the **Comment** field on the Vote-By-Mail Request dialog, which is not public record.

E-Mail If the voter provided an email address, enter it here. The system will attempt to validate the email address by verifying it contains proper syntax, such as an @ sign before the domain name. This doesn't guarantee that the email address is valid, but it will identify those that cannot be mailed by your SMTP server.

If the voter submits a mail ballot request through your website, when the request is processed, the email address submitted by the voter will be stored automatically in this field, replacing any previously entered email address.

The email address entered here will be used by the Email run for voters requesting delivery of their ballot by email. It will also be used for the Vote-By-Mail notification runs and list-of-candidate runs.

You can create an email message from yourself to the voter by holding down the Ctrl key on your keyboard and clicking the email address. This feature requires that your workstation have an email client such as Microsoft Outlook installed. Web based email systems are not supported for these "one-off" emails.

Email addresses are reported in the reports Absentee Status for all Absentee Voters, Absentee Status for Email/Fax Delivery Voters, and the Unsent Email/Fax Absentee Ballots.

> **Note:** Voter email addresses can be made available to candidates and political parties, but they are exempt from public records requests by other entities. When creating a report or export file in response to a public records request, you should remove the email addresses from the report/export file before releasing it to the requestee.

Military Select this check box to turn on the military setting for this voter. The military setting is used for reporting purposes; it does not ensure that the voter will be included in early batches of mail ballots sent to overseas voters. To be included in the early overseas batch, the voter's Vote-By-Mail address must be set up a particular way for overseas. See Addresses_for_Overseas_Voters for more information.

If you change this setting, all requests made after the change will have the new setting, but requests made prior to the change will retain the old setting. In the voter's registration record, the **Military** setting can be changed for an individual mail ballot request, without affecting the setting here. See Mail-Ballot Adjustments for more information.

Mil Dep Select this check box to turn on the military dependent setting for this voter. Voters with the military dependent setting are treated the same as military voters; that is, they are included in the mailing lists and report totals of military voters. Note that both military settings (**Military** and **Mil Dep**) cannot be selected; you must choose one or the other.

Supervised Voting The voter resides at an assisted living or similar facility, wants their Vote-By-Mail ballots delivered to the facility, and needs supervised voting at their facility.

Request Type The value here depends on how you accessed this dialog, whether a new (single) request, an all-elections request, or an FPCA request.

Single Election—You can record a request for one or more specific elections by checking the **Request** check box for the election(s).

All Elections or **FPCA**—Automatically selects the **Request** check boxes for all elections listed for which the voter is eligible and enters a date in the **Expiration of All Elections** year field. If the voter does not wish to vote in a specific election, you can clear the **Request** check box for that election.

Note:

Should the voter move to another Florida county prior to the expiration date of their all-elections or FPCA request, the request will not move with their voter record. The voter will need to make another all-elections or FPCA request in their new county.

If a voter previously made an all-elections or FPCA request, processing undeliverable mail with no change of address or an out-of-state address automatically triggers the cancellation of any outstanding requests for future elections (unless a ballot has already been delivered), sets the expiration date of the all-elections/FPCA request to today's date, and schedules a Canceled Requests Notice to be sent to the voter.

Expiration of All Elections The field indicating the expiration year defaults to the end of the calendar year in which the second regularly scheduled general election after the request date occurs. For example, if a voter makes an all-elections request in July 2010, the request will expire on Dec. 31, 2012. The year can be changed to an earlier date if the user requests a shorter time period for receiving mail ballots. It can also be changed to a later date that is no later than two years of the default expiration date.

This field will be cleared and become uneditable if you deselect the **Request** check box for an election and the voter is not an FPCA voter.

Request Status Indicates the current status of each request. Possible statuses include:

Vote-By-Mail option not set for this election—The election has not been set up for mail ballots. (This is done in **ELECTIONS > Maintain Election Settings > Election Maintenance > Vote-By-Mail Requests**.)

Already Requested—If the voter already has a Vote-By-Mail Request for this election.

Election is After the Next General—If the election occurs after the end of the calendar year of the second general election, which will be after the all-elections or FPCA request has expired.

Request Cancelled—If the voter cancels their previous request for a specific election

Voter not in the city—If the voter does not reside in the city where a city election is scheduled.

Voter's party not voting—If the election is a primary and the voter's party is running no candidates.

Voter's precinct not voting—If the voter's precinct is not voting in the election.

Change Address/Add Address Click to open the Vote-By-Mail Addresses dialog where you can enter a default ballot address for all elections (if you county permits this type of address) or a Ballot Address for this Election.

Request Select to record a Vote-By-Mail Request for specific elections.

Print Request Select to print a Vote-By-Mail Information Sheet when you save the dialog.

Voter Record Verification Info The driver's license/state ID number or the last four digits of the Social Security Number from the voter's record.

Requestor Information Use this area to record the requestor's information, whether they are a third party or the voter themself.

After entering the requestor's name and address, in the Relationship field, select one of the available options:

When the request is made by the voter or the ballot is picked up by the voter, this field should show *Self*.

To enter a request from someone other than the voter, the person must be a member of the voter's family (one of the options listed in the field) or their legal guardian.

If someone else picked up a ballot for the voter, you can select from the list or enter something else, such as *Neighbor*.

Important: The State requires that vote by mail ballot requests include the last four digits of the requestor's Social Security Number or the driver's license/state ID number and that the type of ID provided for the voter is indicated. If the requestor is anyone except Self, make sure the Requestor DLN or Requestor Last4SSN field is filled out in addition to the Voter DLN or Voter Last4SSN.

Note: Identifying information for the voter (DLN or Last4SSN) entered here is included in the Vote-By-Mail Ballot Request Information daily file.

How Requested Select the way the voter requested the ballot. The options listed in the drop-down list will depend upon the status of the election:

Open elections—Requests can be made:

Person—In person.

Mail, **Phone**, **Fax**, or **E-Mail**—By mail, phone, fax, or email.

Web—Via the elections office website.

No ballots can be issued while the election status is Open.

Active elections—Requests can be made in the same way as in Open elections. You can also issue mail ballots and receive Federal Write In Absentee Ballots, so these options are added to the list:

Online—Used by counties participating in the Federal Voting Assistance Program (FVAP), which allows UOCAVA voters to request and receive ballots online.

Pick-up—The voter requested and picked up their ballot from the Supervisor's office. Pickup ballots can be issued up to 49 days in advance of the election. If your county uses ballot numbers for pickup voters, when **Pick-up** is selected, the **Ballot Number** field appears so you can enter the number of the ballot issued to the voter. The delivery method is automatically set to **PkUp**.

Note: Ballot printing for pickups and third-party pickups is not supported on this dialog. If your county uses the ballot printing feature, pickups should be processed on the Voting Election dialog.

3rdParty—The ballot was requested and picked up by a third party presenting the voter's signed request that the ballot be given to the third party. If your county uses ballot numbers for pickup voters, when **3rdParty** is selected, the **Ballot Number** field appears so you can enter the number of the ballot issued to the voter. The delivery method is automatically set to **3rdP**.

FWAB—The voter has submitted a Federal Write In Absentee Ballot. Only voters who are absent uniformed service members or citizens residing outside the United States can use this type of ballot.

Return Processing Only elections—Requests for mail ballots can no longer be taken, but ballots can be issued, so the options are Pick-Up, 3rdParty, FWAB and Online.

Requested Delivery Select the delivery method to be used when no delivery method has been specified for a particular election. The delivery method specified for a voters previous Vote-By-Mail Request is selected by default. If this is the first Vote-By-Mail Request for the voter, the default value will be **Mail**.

If the voter wants a different method of delivery for a particular election, the delivery method for that election can be changed on the Mail-Ballot Adjustments dialog, which is accessed from the **Vote-By-Mail** tab in the voter's registration record.

Mail—If the voter provided an address, you will need to enter it on the Vote-By-Mail Addresses dialog. To open this dialog, click the **Add Address** button in the **Change Address** column in the list of elections.

Email—For email delivery, you will need to enter the voter's email address in the **E-Mail** field.

Fax—For fax delivery, you will need to enter the voter's fax number on the Vote-By-Mail Addresses dialog. To open this dialog, click the **Add Address** button in the **Change Address** column in the list of elections.

Accessible Online—When the **How Requested** field is **Online**, the **Requested Delivery** field will be set automatically to **Accessible Online**. This delivery option will only appear for All Elections requests.

Note: Only UOCAVA voters can receive ballots by email, fax, or online. For non-UOCAVA voters, the **Online** option is unavailable.

Date Requested This field displays the current date and time. If the request was received earlier than today, change the date to reflect the actual date you received the request. The date you enter will stick as the default request date for subsequent requests for this voter until you change the date or restart the program. After a restart, this field reverts back to the current date and time.

Issue Ballot If you selected **Pick-up** or **3rdParty** in the **How Requested** field and the election is Active, the **Issue Ballot** box will appear.

How Delivered—If you chose Pick-Up or 3rdParty in the How Requested field, the How Delivered field defaults to Pkup or 3rdP, respectively.

Ballot Number—If your county uses ballot numbers, enter the number here. Entry of a ballot number for faxed or emailed ballots is optional if your county prefers to assign the ballot number after the faxed or emailed ballot has been returned and the votes transposed to an actual ballot.

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Process Mail Ballot Requests Received

Vote-by-mail requests submitted via the Mail Ballot Request Service are sent to the Web Vote-by-Mail Request Queue in Voter Focus. This eliminates the need to rekey the information from the request forms into voter records. All that's required is to check the web request and give Voter Focus the go-ahead to insert it into the voter's record.

> **Note:** Mail ballot requests that require the voter to complete an affidavit because they chose to have the mail ballot delivered to a new address that is not currently on file with FVRS do not appear in the Web Vote-by-Mail Request Queue in Voter Focus to prevent premature data-entry.

Your county will also receive an email for each voter who has submitted a mail ballot request online. An email is not sent if the voter is required to complete an affidavit.

The email address submitted by the voter will be stored in the **E-Mail** field on the voter's **Vote-by-Mail** tab, replacing any previously entered email address. (These emails are not considered public record.)

For a list of the voters who have submitted web requests that have not yet been processed, run the Pending Web Absentee Requests report.

Processing a request from the website creates an entry on the voter's **Comms** tab called **Web Absentee Request**. Double-click this entry to see a summary of the request on the **View Web Absentee Request** dialog.

> **Note:** An entry is not made on the voter's Comms tab if the voter is required to complete an affidavit.

For more information about the processing of web requests, see Process Vote-by-Mail Requests Submitted on Your Website in the Voter Focus Help system.

For mail ballot requests that required an affidavit to returned, when the affidavit is received by your office, you can manually enter the vote-by-mail request. For more information see the following topics in the Voter Focus help system:

- Mail Ballot Request for a Specific Election
- Mail Ballot Request for All Elections
- Mail Ballot Request for Several Elections

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EXHIBIT J:

VR Systems Manual: "About Capturing

Questionable Vote-By-Mail Requests from the Web"

Capturing Questionable Vote-By-Mail Requests from the Web

Voter Focus offers an optional feature to help detect fraudulent Vote-By-Mail requests submitted on your website through the Absentee/Mail Ballot Request Form. The requests are blocked from being processed into voter records, thus preventing the release of mail ballots to those intent upon voter fraud.

To use this feature, you run the Fraud Detection program, which scans requests from a specified time period, looking for those originating from the same IP address or having the same email address for ballot delivery. Requests whose addresses present no issue are passed to the Web Request Queue for processing into voter records. But questionable requests are detained for user review.

During your review, you can release a detained request to the Web Request Queue or you can put an indefinite hold on it. Where an address is known to be legitimate, you can set the Fraud Detection program to pass all requests associated with that address.

The Fraud Detection feature is under **Vote By Mail > Vote-By-Mail Fraud Detection**. To see this feature, your county must have this option selected:

VOTER FOCUS ADMIN > System Options > Vote By Mail > Use Vote-By-Mail Fraud Detection

And the user must have the permission:

VoteByMailFraudDetection

We recommend you run the Fraud Detection program and evaluate its findings on a daily basis.

How Fraud Detection Works

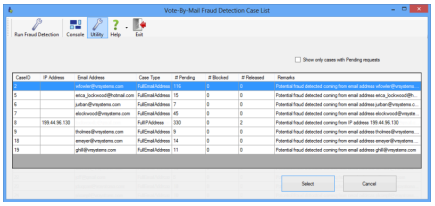
The Fraud Detection program uses these parameters on the Vote-By-Mail Fraud Detection Parameters dialog to determine whether a request should be held for review:

Email Threshold—The number of requests having the same email address at which the program will begin capturing the requests. For example, if the threshold is 5, the program will pass the first four requests with this email address but will detain the fifth and all subsequent requests with this address.

IP Address Threshold—The number of requests having the same IP address at which the program will begin capturing the requests. As with the email threshold, the program will detain any request meeting or exceeding the threshold.

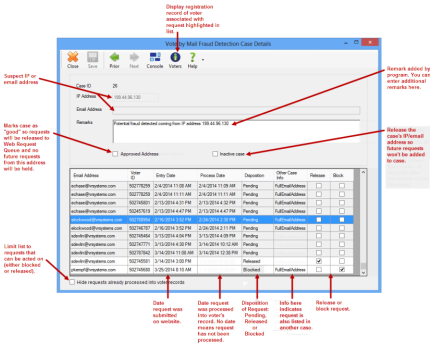
Date of First Web Request to be Analyzed—The date at which the program will begin evaluating web requests. This date must be at least a year in the past. The program will look at all requests submitted on this date and thereafter until today, including those that have already been processed into voter records.

The program checks all requests submitted on the website, beginning with the first request on the start date, placing a hold on any request exceeding the email or IP address threshold, except for those that have already been processed into voter records. It then presents the user with its findings, organized as a list of fraud *cases*, as shown in the screenshot below. Each case contains the web requests exceeding the threshold for a particular IP or email address.



You can then open a case, examine its requests, and make determinations on individual requests within the case or a general determination on the case itself:

- For individual requests, you can either release the request, block it, or leave it pending. A released request goes to the Web Request Queue where it can then be processed into the voter's record by the county user responsible for web request processing. Released requests continue to appear in the case list, as do requests that have been processed. If you don't want to see processed requests, you have the option of hiding them, so you can focus on requests that can still be acted upon.
- For cases where the address is known to be legitimate, you can mark the address as approved, which releases all requests in the case to the Web Request Queue and allows any future requests associated with the address to be passed by the fraud detection program. Approving an address lets you pass requests from known locations, such as public libraries, where voters might use public computers to submit Vote-By-Mail requests.


Display registration record of voter associated with request highlighted in list.
Vote-By-Mail Fraud Detection Case Details
Close
Save
Prior
Next
Console
Voters
Help
Case ID
IP Address
Email Address
Remarks
Approved Address
Inactive case
Suspect IP or email address
Marks case as "good" so requests will be released to Web Request Queue and no future requests from this address will be held.
Remark added by program. You can enter additional remarks here.
Release the case's IP/email address so future requests won't be added to cases.
Limit list to requests that can be acted on (either blocked or released).
Hide requests already processed into voter records
Date request was submitted on website.
Date request was processed into voter record. No date means request has not been processed.
Disposition of Request: Pending, Released, or Blocked
Info here indicates requests also listed in another case.
Release or block request.

Disposition of Requests

Web requests have one of three dispositions:

Pending—For counties using fraud detection, all web requests are assigned this disposition when they come into the Voter Focus system.

Note: For counties not using fraud detection, web requests are automatically assigned the Released disposition when they enter the system. Should a county turn on the fraud detection option, those requests will appear in a case should either of their addresses meet a threshold, but their disposition will remain Released. Should the county turn off fraud detection, the disposition of all web requests will be changed to Released.

Released—This disposition is assigned by the user upon determination that the request is legitimate. It allows the request to enter the Web Request Queue for processing into the voter's record. Requests with the disposition Released will continue to appear in the case, even after they have been processed. If a county does not use fraud detection, all web requests are assigned the disposition Released.

Blocked—This disposition is assigned by the user upon determination that the request is fraudulent. It prevents entry of the request into the Web Request Queue. Should a Blocked request be reevaluated later as legitimate, it can be released by selecting the **Release** check box on the Vote By Mail Fraud Detection Case Details dialog.

If a request appears in more than one case and you change its disposition in one of those cases, the change will be reflected in the other case.

Running the Fraud Detection Program

To run the Fraud Detection program, go to **Vote By Mail > Vote-By-Mail Fraud Detection > Run Fraud Detection**. During the run, if the programs finds new requests matching an existing case, it adds those requests to the case and displays a message indicating how many were added. If the program finds a new address meeting one of the prescribed thresholds, it will ask if you want to create a new case. If you say yes, the new case is added to the list of existing cases on the Vote-By-Mail Fraud Detection Case List dialog. If you say no, the requests associated with the suspect address will still be marked as Pending, even though a case has not been created. On subsequent runs of the program, if the same thresholds are used, you will be asked again if a new case should be created for those requests.

When counting the requests to meet one of the prescribed thresholds, the program does not consider whether a request has already been processed from the Web Request Queue into a voter's record. The first requests from an IP or email address that do not meet the threshold will not be stopped by the Fraud Detection program, so it is possible that a new case will contain requests that have already been processed, delivered, and perhaps even voted. (The same is true for requests processed before the county began using the fraud detection facility.) These requests cannot be "pulled back" or otherwise blocked by the Fraud Detection program.

The program does not evaluate the election for which a request is being made; requests for different elections can appear in a single case.

An all-elections request is considered a single request for the purpose of the Fraud Detection program.

Approving "Good" Addresses

In situations where an IP or email address is from a known legitimate source, you can mark the address as approved. This releases all requests in the case to the Web Request Queue unless a request appears in another case where the address is not approved. Approving an address allows any future requests associated with the address to be passed by the Fraud Detection program. To identify a case as good, select **Approved Address** on the Vote-By-Mail Fraud Detection Case Details dialog.

Note that if you select **Approved Address** and then clear this check box, the disposition of individual requests in the case will be reset to the settings in the last saved version of the case.

Making a Case Inactive

A case can be made inactive, which releases the once questionable IP or email address so that future requests with the address will be passed by the Fraud Detection program. This allows for situations where an internet service provider dynamically assigns a previously questionable IP address to a new, presumably legitimate location.

If you inactivate a case—by selecting **Inactive Case** and clicking **Save** on the Vote By Mail Fraud Detection Case Details dialog—the disposition of any requests in the case is essentially frozen. Inactive cases do not appear on the Vote-By-Mail Fraud Detection Case List, so the case itself can no longer be viewed and the disposition of requests in the case cannot be changed, unless they happen to appear in other, still active, cases.

Fraud Detection Reports

- Active Cases in Vote-By-Mail Fraud Detection
- Approved Addresses in Vote-By-Mail Fraud Detection
- Blocked Requests in Vote-By-Mail Fraud Detection
- Inactive Cases in Vote-By-Mail Fraud Detection
- Questionable Web Requests for an Election

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Vote-By-Mail Flexible Report

To access: **REPORTING > Reports > Vote-By-Mail Reports > Vote-By-Mail Voter Lists > Vote-By-Mail Flexible Report**

You can create reports tailored to your specific needs by selecting from mail ballot-related criteria on this dialog. Refer to the following topics for some examples of how the Vote-By-Mail Flexible report can be run:

Absentee Status for All Absentee Voters

Absentee Status for Domestic Voters

Absentee Status for Email/Fax-Delivery Voters

Absentee Status for Military & Civilian Overseas Voters

Unsent Email/Fax Absentee Ballots

FWAB Ballots Received

> **Note:** Protected voter addresses are not included in any report produced from this dialog.

Fields and Controls on this Dialog

Output Format	**Status Report**—Produces an onscreen report in Crystal Report format. **Vote-By-Mail Status Export**—Produces a file in either TXT or XLS format. The report lists voters meeting the criteria specified for the report run. **Vote-By-Mail Ballot Export**—Produces a file in either TXT or XLS format. The report returns information on mail ballots meeting the criteria specified for the report run. **Note:** The first two options—**Status Report and Vote-By-Mail Status Export**—query the database table where mail-ballot requests are recorded, so you can expect these outputs to return only one entry per voter. If a voter requested a second or third ballot, only the last ballot they requested is reported. The third option— **Vote-By-Mail Ballot Export**—queries the database table where mail ballots are recorded, so there can be multiple entries for a voter if they were sent more than one ballot.
Absentee Status	The status of the ballots reported: • Requested, not Delivered • Delivered, not Returned • Returned • All (requested, delivered, and returned ballots)
Date Selection (Requested, Ballot Delivered, Ballot Returned)	Click **Select Dates** and enter the starting and ending dates of the time period to be reported.
Disposition	*Available only when **Absentee Status** is **Returned**.* Select one of the ballot dispositions (**Accepted**, **Referred**, or **Returned Undeliverable**) or a single referral reason (**Referral Code**).
Location	Select one of the voter categories to report: • Civilian Domestic • Civilian Overseas • Domestic Military • Absent Domestic Military • Military Overseas • UOCAVA (includes Civilian Overseas, Absent Domestic Military, and MilitaryOverseas) • All (includes all Vote-By-Mail voters for the election) The category reported will be the voter's category at the time the ballot was mailed/emailed/faxed to the voter.
Supervised Voters	**Include**—In the report, include supervised voters. **Exclude**—Do not include supervised voters. **Only**—Report only on supervised voters and exclude all other voters.
Delivery Method Requested	Select the ballot delivery method requested by the voter (Accessible Online, Email, Fax, or Mail). Leave this field blank to report on all delivery methods requested.
How Requested	*Not available when **Output Format** is **Vote-By-Mail Ballot Export**.* Select the method by which the voter requested their mail ballot (such as Mail, Phone, Fax, Email, FWAB, FPCA, etc.).

How Delivered	*Not available when **Absentee Status** is **Requested, not Delivered**.* Select the method by which the ballot was delivered to the voter (Accessible Online, Pickup, Fax, Mail, Email, or Third Party).
How Returned	*Available only when **Absentee Status** is **Returned**.* Select the method by which the ballot was returned to the elections office (Mail, Email, Fax, Counter (in-office absentee), and Early Vote). **Note:** Not all of the returned options will be available for elections in the past. The ballot returned field for all ballots was introduced in the 2012 release of Voter Focus. Prior to that, ballot returned data was collected only for overseas ballots. For very old elections, this data was not collected at all.
Include Protected Voters	Include voters with protected addresses in the report.
Party Selection	Click **Select Parties** and select the political party affiliations to be reported. The party reported will be the voter's party at the time the ballot was mailed/emailed/faxed to the voter.
District Selection	Select a district to report from the drop-down list or leave this field blank to report on all districts.
Ballot Style Selection	*Not available when **Absentee Status** is **Requested, not Delivered**.* Click **Select Ballot Styles** to show a list of the permanent ballot styles for this election and select one or more ballot styles to report. To report on all ballot styles, leave this field blank.
Precinct Selection	Click **Select Precincts** to show a list of the precincts voting in this election and select one or more precincts to report. To report on all precincts, leave this field blank. The precinct reported will be the voter's precinct at the time the ballot was mailed/emailed/faxed to the voter.
Print Specification	Click to print a copy of the dialog with your current selections.
OK	Click to run the report with the selected parameters.

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EXHIBIT K:

VR Systems Report: “Questionable Web Requests for an Election”

Questionable Web Requests for an Election

To run: **REPORTING > Reports > Vote-By-Mail Reports > Fraud Detection Reports > Questionable Web Requests for an Election**

This report lists the Vote-By-Mail requests submitted on the county's website that might be fraudulent. It groups requests by matches such as the source IP address, requestors other than the voter, the delivery mailing address, email address, or fax number, and voter ID.

For more information on Vote-By-Mail fraud detection, see About Capturing Questionable Vote-By-Mail Requests from the Web.

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EXHIBIT L:

VR Systems Dialog: “Mail-Ballot Adjustments”

Mail-Ballot Adjustments

To access: **Voter Maintenance > {*voter*} > Vote-By-Mail** tab **> {*election*} > Mail-Ballot Adjustments**

This dialog lets you make various changes an existing mail ballot or early voting request for an election, including:

- Recording when a ballot has been issued and how it was issued.
- Canceling a request for a mail ballot.
- Changing the request from Military to Civilian. This is important because military ballots (Military Overseas and Military Domestic) are mailed out earlier than their civilian counterparts.
- Recording the release of replacement ballots.
- Reversing the release or return of ballots.
- Reversing votes cast during early voting and in-office absentee voting.
- Preventing the return of a mail ballot.
- Changing the delivery method from mail to email or fax.

Adjustments to Vote-By-Mail and early voting requests are automatically reflected in the various Vote-By-Mail and early voting reports. For example, changing the **Mil/Civ** setting affects where the request is listed in the Absentee Totals for an Election report, which lists military and civilian mail ballot voters separately. Changing a voter's delivery from mail to email or fax removes the voter from the Deliver Ballots run and adds them to the Unsent Email/Fax Absentee Ballots report.

See Make Adjustments to Existing Mail-Ballot Requests for specific instruction on adjusting requests under various scenarios.

Certain buttons on the dialog may be disabled based on ballot status or user permission. For example, the **Reverse Return of Ballot** button is disabled if the voter has not returned an issued ballot or cast an early vote.

With the exception of changes to the **Mil/Civ** field, adjustments to a request are immediately recorded in the Voter Focus database and can be seen on the Absentee Activity Dump report as soon as they are made. For instance, if you reverse delivery of a ballot and click **Audit Report**, you can see the reversal, even though you haven't yet saved your changes.

Fields and Controls on this Dialog

Delivery Method	Indicates how the ballot will be delivered. The value defaults to the method requested by the voter when they made the Vote-By-Mail Request, but you can change it to another method if the voter changes their mind. The options here are: **Mail**—For mail delivery, if the voter provided a Vote-By-Mail address, you will need to enter the address on the Vote-By-Mail Addresses dialog. **Email**—For email delivery, you must enter the voter's email address in the **E-Mail** field on the voter's Vote-By-Mail tab. **Fax**—For fax delivery, you must enter the voter's fax number on the Vote-By-Mail Addresses dialog. Selecting **Email** or **Fax** automatically sets an overseas condition for the voter for this election.
Ballot Return Blocked	Indicates that the voter's mail ballot has been blocked from being return processed.
Block/Unblock Return	Click **Block Return** to prevent return processing of a voter's mail ballot because they voted at the polls, even though they have mailed the ballot back to the elections office. See Block the Return of a Voter's Mail Ballot for more information. Click **Unblock Return** to reverse the block.
Comments	Use this field to indicate why the change was made, such as why a second ballot was issued or why a voter's return was blocked.
O'seas	This field appears only if the ballot has been returned and the voter is an overseas voter. The possible values are M—Mail, E—Email, and F—Fax. This information is collected for reporting to the U. S. Election Assistance Commission (EAC).
Change Mil/Civ	Toggles the Military/Civilian setting assigned to this request.
Cancel Request	Cancels the Vote-By-Mail Request. The **Request Status** on the **Vote-By-Mail** tab displays *Request Canceled*. Any ballots already issued to the voter remain assigned to this Vote-By-Mail Request. **Note:** If a mail ballot is returned by the postal service as undeliverable to the voter, do not cancel the request. See How to Process an Undeliverable Mail Ballot for instructions.
Audit Report	View the Absentee Audit Report for this Vote-By-Mail Request. Information in the Absentee Audit Report cannot be changed or deleted.
Release Ballot 2nd/3rd Ballot	Records the issuance of a second or third replacement ballot. This button displays the Release Ballot dialog where you record issuance of the ballot.

Reverse Ballot Delivery	Reverses the issuance of a ballot to the voter. You should perform a reverse ballot delivery operation only when a ballot has not yet been mailed or otherwise delivered to the voter. If your county uses ballot numbers, you are asked if you want to delete the ballot number. Click **Yes** if you want to delete the ballot number from the database so it can be reused for another voter; this removes the ballot number from the list of used numbers. Clicking **No** cancels the reverse ballot delivery operation. **Note**: You must be granted the *MailBallotReversal* permission to use this option.
Reverse Return of Ballot	The ballot is no longer marked as voted. **Note**: You must be granted the *MailBallotReversal* permission to use this option.
Reverse Early/In-office Vote	The vote cast during early voting or in-office absentee voting is reversed. **Note**: You must be granted the *MailBallotReversal* permission to use this option.
Reverse Request for 2nd/3rd Ballot	The request for a replacement ballot that has not yet been delivered to the voter is reversed in the Voter Focus system. **Note**: You must be granted the *MailBallotReversal* permission to use this option.
Previous Request	Displays the previous election for which this voter has a Vote-By-Mail Request.
Next Request	Displays the next election for which this voter has a Vote-By-Mail Request.
Close	Closes the dialog and returns you to the **Vote-By-Mail** tab in the voter's record. All changes made on the Mail Ballot dialog are saved to the database.
Maintain Requester Information	Opens the Maintain Requester Information dialog. Use this if a third party requested or picked up a ballot for the voter.
Canvassing Board Reinstatement	Reinstates a mail ballot previously referred by the elections office but reinstated by the Canvassing Board. Reinstated ballots are counted as valid mail ballot returns. Any notices (such as an Absentee Referral Letter or a Signature Affidavit Notice) that were scheduled when the ballot was referred are unscheduled automatically by a reinstatement. See Reinstate a Mail Ballot for more information.

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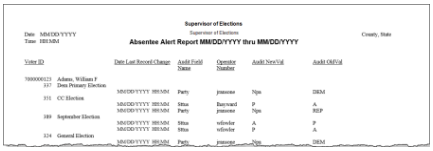
EXHIBIT M:

VR Systems Report: “Absentee Alert Report”

Absentee Alert Report

To run: **REPORTING > Reports > Vote-By-Mail Reports > Vote-By-Mail Voter Lists > Absentee Alert Report**

This report provides voter audit information for any voters who have outstanding Vote-By-Mail requests. It lists changes to voter records, such as a change of residence, mailing, default ballot address, or ballot address for this election, during the time period you specify. This report should be examined to see if any corrective action is required by the Vote-By-Mail coordinator.



Supervisor of Elections

Supervisor of Elections

Date MM/DD/YYYY
Time HH:MM

County, State

Absentee Alert Report MM/DD/YYYY thru MM/DD/YYYY

Voter ID		Date Last Record Change	Audit Field Name	Operator Number	Audit NewVal	Audit OldVal
7000000123	Adams, William F					
107	Dem Primary Election					
		MM/DD/YYYY HH:MM	Party	jonsone	Npa	DEM
101	CC Election					
		MM/DD/YYYY HH:MM	Situs	Barnyard	P	A
		MM/DD/YYYY HH:MM	Party	jonsone	Npa	REP
100	September Election					
		MM/DD/YYYY HH:MM	Situs	wfowler	A	P
		MM/DD/YYYY HH:MM	Situs	wfowler	P	A
124	General Election					
		MM/DD/YYYY HH:MM	Party	jonsone	Npa	DEM

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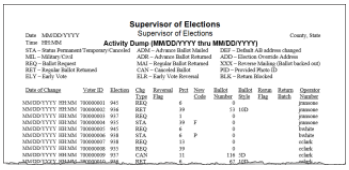
EXHIBIT N:

VR Systems Report: "Absentee Activity Dump"

Absentee Activity Dump

To run: **REPORTING > Reports > Vote-By-Mail Reports > Vote-By-Mail Audit Reports > Absentee Activity Dump**

This report lists the Vote-By-Mail transactions by user with a date. Use this report to track a user's data entry operations. The report contains a shorthand of mail ballot requests entered, delivered, and returned. You have the option of limiting the data to a specified date range.



Supervisor of Elections
Supervisor of Elections
Activity Dump (MM/DD/YYYY thru MM/DD/YYYY)

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EXHIBIT O:

PRINELLAS PROTECED VOTER WEBSITE BLOCK

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Google Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Select Language

Powered by Google Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Last Name:

Siamas

Date of Birth:

[redacted]

House Number of Voter's Residence Address:

[redacted]

Last Four Digits of SSN:

[redacted]

OR

Driver's License (or State ID) Number:

[redacted]

Search

Back

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email:** Election@VotePinellas.gov (mailto:election@votepinellas.gov) | Public Records Request Form (/General-Information/Contact-Us/Public-Record-Request)

P:(727) 464-VOTE (8683) ● F:(727) 464-6239

Election Service Center
13001 Starkey Rd.
Largo, FL 33773
(Starkey Lakes Corporate Center)

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

County Building
501 First Avenue North
St. Petersburg, FL 33701
(Fifth Street North Entrance)

F.S. 668.6076 Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. To submit a public records request, use this form. (/General-Information/Contact-Us/Public-Record-Request)

Absentee Status for All Absentee Voters

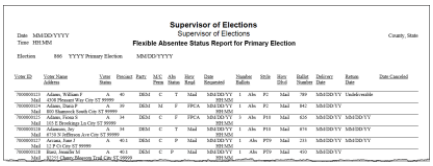
To run a report having the same information as the old Absentee Status for All Absentee Voters report:

1. Go to **REPORTING > Reports > Vote-By-Mail Reports > Vote-By-Mail Voter Lists > Vote-By-Mail Flexible Report**.
2. On the **Vote-By-Mail Flexible Report** dialog, make the following selections:
   - **Output Format** = Status Report
   - **Absentee Status** = All
   - **Location** = All

   To limit the report to a single district within a district type (for example, CC district 1), select from the **District Selection** drop-down list. To run the report for all districts, leave the **District Selection** field blank.
3. Click **OK** to run the report.

The title of the report is now the Flexible Absentee Status Report for *<election name>*.

When run with the above parameters, this report provides a complete list of all Vote-By-Mail requests for the selected election with the dates the request was made, the ballot was delivered/mailed, and the ballot was returned. It includes the ballot style and number of each ballot that the voter has received. The report also includes email addresses for the purposes of sending overseas voters candidate information via email.



Supervisor of Elections
Supervisor of Elections
Flexible Absentee Status Report for Primary Election

This is a long report consuming at least two lines for each voter. An underline separates each voter entry, which on some printers can take a long time to print. If you are interested in a single voter's information, we recommend you instead retrieve the voter's record, go to their Vote-By-Mail Request Status dialog, and click **Audit Report** to create their Absentee Audit Report.

To view a list of other ways to run this flexible report, see Vote-By-Mail Flexible Report.

3773 Commonwealth Boulevard • Tallahassee, FL 32303 • 850-668-2838 • 850-668-3193

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EXHIBIT O:

Summary of Affected Judicial Officers and Staff

Exhibit O – Summary of Affected Judicial Officers and Staff

This exhibit lists judges and judicial assistants within the Florida Second District Court of Appeal and the Sixth Judicial Circuit whose vote-by-mail ballots were flagged for unverified submission or were submitted through restricted channels, consistent with the fraud patterns outlined in the accompanying affidavit.

Name	Position	Court	PRI-Ballot Req Date	GEN-Ballot Req Date	Verified ID Status	Protected	Judge Chambers Implicated
Nelly N. Khouzam	Judge/Close Relation	2nd DCA	6/23/2024	9/9/2024	NO/NO	YES	Nelly Khouzam/Morris Silberman
Morris Silberman	Judge/Close Relation	2nd DCA	6/23/2023	9/9/2024	NO/NO	YES	Morris Silberman
Craig C Villanti	Judge	2nd DCA	6/23/2023	9/9/2024	NO/NO	YES	Craig C. Villanti
Gabriella C. Silberman	Close Relation	2nd DCA	6/23/2023	9/9/2024	NO/NO	YES	Morris Silberman/Nelly N. Khouzam
Patricia Muscarella	Circuit Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Patricia Muscarella
Thomas Ramsberger	Judge/Close Relation	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Peter Ramsberger/Thomas Ramsberger
Louise Smith	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Shawn Crane -Chief Judge 6th Circuit
Kim Campbell	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Kim Campbell
Pamela A.M. Campbell	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Pamela A.M. Campbell
Sherwood Coleman	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Sherwood Coleman
Jennifer Dubbeld	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Jennifer Dubbeld
Philip J Federico	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Philip J Federico
Evan Frayman	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Evan Frayman
Brian Gnage	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Brian Gnage
Mary M. Handsel	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Mary M. Handsel
Elizabeth Jack	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Elizabeth Jack
George Jirotka	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	George Jirotka
Doneene Loar	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Doneene Loar
Philippe Matthey	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Philippe Matthey
Patrice Moore	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Patrice Moore
Cynthia J. Newton	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Cynthia J. Newton
Nichole Pearlman	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Nichole Pearlman
Joshua Riba	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Joshua Riba
Pat Siracusa	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Pat Siracusa
James R. Stearns	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	James R. Stearns

See Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009); Williams v. Pennsylvania, 136 S. Ct. 1899 (2016); Fla. R. Gen. Prac. & Jud. Admin. 2.330(d)(1); Canon 3E(1)(a), Fla. Code Jud. Conduct.

Name	Position	Court	PRI-Ballot Req Date	GEN-Ballot Req Date	Verified ID Status	Protected	Judge Chambers Implicated
Susan St. John	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Susan St. John
Kimberly Todd	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Kimberly Todd
Amy M. Williams	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Amy M. Williams
John Carassas	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	John Carassas
Diane Croff	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Diane Croff
Robert Dittmer	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Robert Dittmer
Holly Grissinger	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Holly Grissinger
Edwin Jagger	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Edwin Jagger
James Pierce	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	James Pierce
Lauralee G. Westine	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Lauralee G. Westine
Debi McCarty	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	Daniel D. Diskey
Stacy Wisman	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	David Ellis
Jill Psenisky	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	Philip J Federico
Bonnie Whitehall	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	George Jirotka
Valerie McGivern	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	Thomas Ramsberger
Melinda Vincent	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	Steve Berlin
Annie Nguyen	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Joseph A.Bulone
Jess Rayburn	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Julie L. Sercus
Amber Demiduk	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	John Carassas
Veronica Jupiter	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Diane Croff
Lisa Schultz	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Frank Grey
Tracy Curley	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Kathleen T. Hessinger
Michelle Hall	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Edwin Jagger
JoAn Caffentzis	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Lorraine Kelly
Vicki Masterson	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Theodora C Komninos
Cheryl Nierengarten	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Cathy McKyton
Darleta Burris	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	James Pierce
Pamela Gariepy	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Joseph Poblick
Kim Haumann	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Brett Szematowicz
John D Couriel	Judge	Supreme			NO/NO	YES	John D Couriel

See Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009); Williams v. Pennsylvania, 136 S. Ct. 1899 (2016); Fla. R. Gen. Prac. & Jud. Admin. 2.330(d)(1); Canon 3E(1)(a), Fla. Code Jud. Conduct.

Each entry is based on data sourced directly from the Florida Department of State's *Vote By Mail Early Voting Reports* and the Florida Voter Registration System (FVRS), as cited in Exhibit B and corroborated in Exhibits H and N.

Judicial assistants are confidential agents of the judge and have access to chambers communications, calendar settings, and sensitive court operations. If a judicial assistant is the victim of targeted vote-by-mail fraud related to an ongoing appeal, the judge is likely to be a material witness or possess personal knowledge of disputed facts. As such, disqualification of the judge is mandatory under Rule 2.330(d)(1) and Canon 3E(1)(a), even if the judge's own voter record is not directly implicated. Failure to grant disqualification under these circumstances not only violates ethical and procedural mandates, but also exacerbates the structural error inherent in this case, undermining the constitutional integrity of the tribunal.

EXHIBIT P:

PRINELLAS PROTECED VOTER WEBSITE BLOCK

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Google Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Select Language

Powered by Google Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Last Name:

Siamas

Date of Birth:

[redacted]

House Number of Voter's Residence Address:

[redacted]

Last Four Digits of SSN:

[redacted]

OR

Driver's License (or State ID) Number:

[redacted]

Search

Back

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email:** Election@VotePinellas.gov (mailto:election@votepinellas.gov) | Public Records Request Form (/General-Information/Contact-Us/Public-Record-Request)

P:(727) 464-VOTE (8683) ● F:(727) 464-6239

Election Service Center
13001 Starkey Rd.
Largo, FL 33773
(Starkey Lakes Corporate Center)

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

County Building
501 First Avenue North
St. Petersburg, FL 33701
(Fifth Street North Entrance)

F.S. 668.6076 Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. To submit a public records request, use this form. (/General-Information/Contact-Us/Public-Record-Request)

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Robin Devine, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

12760 Indian Rocks Rd Unit 571 Largo FL 33774

2. On approx 8/10/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 14, ____, 2024.

Robin L Devine
Signature

Robin L. Devine
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 14th
day of August, 2024, by Robin L. DeVine.

Christine Peters
(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned
Name of Notary Public)

Personally Known ☐OR
Produced Identification ☐

[redacted]
Type of Identification Produced

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I, [Your Full Name] Robert A. Ferri, being duly sworn, depose and say:

1. Personal Information:

- I am a resident of Pinellas County, Florida.
- My current address is [Your Full Address] 7602 Ridge Rd. Seminole FL 33772.
- My date of birth is [Your Date of Birth] 08/12/1956.

2. Statement of Facts:

- On [Date You Received the Ballot] 06/23/24, I received a vote-by-mail ballot at my residence.
- I did not request a vote-by-mail ballot for the 2024 Primary Election on 06/23/2024.
- I have not authorized anyone to request a vote-by-mail ballot on my behalf on 06/23/2024.
- I have confirmed with that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.
- I did not sign a DS-DE 160 Form requesting a Vote-By-Mail Ballot a copy of attached.

3. Conclusion:

- To the best of my knowledge, this vote-by-mail ballot was sent to me without my request or authorization.
- I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on [Date] 8/14/24 at Clearwater, FL. [City, State].

[Your Full Name] Robert A. Ferri

[Your Signature] Robert A Ferri

NOTARY ACKNOWLEDGMENT

STATE OF FLORIDA

COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me by means of ✓ physical presence or ___ online notarization, this 14th day of August, 2024, by [Your Full Name].

Christine Peters

(Signature of Notary Public)

Christine Peters

(Name of Notary, typed, printed, or stamped)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ___ OR Produced Identification ✓

Type of Identification Produced: DL [redacted]

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____ / ____ / ____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☒ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** ____ / ____ / ____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** ____ / ____ / ____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, CATHI CHAMBERLAIN, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

10520 SAN FERNANDO BLVD NE; ST. PETERSBURG, FL 33702

2. On 7-18-2024, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on AUGUST, 17, 2024.

Signature

CATHI CHAMBERLAIN

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 17th
day of August, 2024, by Cathi Chamberlain.

Christine Peters

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Christine Peters

(Print, Type, or Stamp Commissioned
Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

AFFIDAVIT

(Amendment to AFFIDAVIT Signed Aug. 17, 2024)

STATE OF FLORIDA

COUNTY OF PINELLAS

I, Cathi Chamberlain, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is: 10520 San Fernando Boulevard, NE; St. Petersburg, FL 33702.
2. I am adding documents related to my Affidavit signed on August 17, 2024 (ATTACHMENT A)
3. "5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election." (ATTACHMENT B and C)
4. "6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot." (ATTACHMENTS B and D)
5. The Pinellas Supervisor of Elections (SOE) and I both agree I did not request a Vote by Mail Ballot on June 23, 2024, yet when I researched my name on the SOE Website, a side portal seemingly shows that I did. (ATTACHMENTS B and E).
6. I am concerned about the integrity of my voter registration information even more at this point than I was when I submitted my previous affidavit signed on August 17th, 2024 (Attachment A) and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on 27th of August, 2024.

Cathi Chamberlain

Signature

Cathi Chamberlain

Full Name

STATE OF FLORIDA
COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me by means of ✓ physical presence or ___ online notarization, this 27th day of August, 2024, by Cathi Chamberlain. Type of Identification Produced: personally known

Christine Peters

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 486653
Expires February 25, 2028

Commissioned Name of Notary Public

ATTACHMENT A

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, [redacted] am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

[redacted]

2. On 7-15-24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024 which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6 I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 17, 2024.

Signature

Cathi Chamberlain

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 17th day of August, 2024, by Cathi Chamberlain.

CHRISTINE PETERS
Commission # HH 456853
Expires February 28, 2028

(Signature of Notary Public Florida)

Christine Peters

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

ATTACHMENT B

FW: public records request

Chase, Dustin <dchase@votepinellas.gov>

Thu 8/15/2024 11:59 AM

To:Rules for Deplorables <cathi@rulesfordeplorablesbook.com>
Cc:Chase, Dustin <dchase@votepinellas.gov>;Smith, Matt <masmith@votepinellas.gov>;McKnight-Taylor, Ashley <ataylor@votepinellas.gov>

Dear Cathi,

It was nice to talk to you today.

The information you've requested is confidential and exempt from disclosure under Florida law (see Section 101.62(2), Florida Statutes). Granted, there is an exception for the voter themselves. Typically, we require the voter to visit our office and present identification to obtain this information. In your case, we are making an exception because we know you, you confirmed with us you sent the email and you verified the last four of your social security number with me.

You mentioned you believe you requested your mail ballot on June 23, 2024. Our records indicate you actually requested it last year on May 19, 2023, at 4:41 p.m. This aligns with the fact that we sent you a mail ballot for the Presidential Preference Primary, which was not returned as undeliverable or voted. Our records also show you voted in person at your polling place on March 19.

Regarding the DS-DE 160 form, The Florida Division of Elections did not finalize the form until nearly a year after you submitted your request. The law does not require all voters requesting mail ballots to file a DS-DE 160: only voters requesting a mail ballot in writing. Since you requested your mail ballot online using your driver license number, there is no DS-DE 160 on file for you. Thereby, we have no records responsive to your request.

We hope that you will help to clarify this process and dispel any misinformation.

Sincerely,

Dustin Chase, Deputy Supervisor of Elections
Representing Julie Marcus, Pinellas County Supervisor of Elections
13001 Starkey Rd., Largo, FL 33773
Phone: (727) 464-4988
Fax: (727) 464-6239
dchase@votepinellas.gov
Follow us @VotePinellas
Like us on Facebook

Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. -- F.S. 668.6076

Conforme a la legislación de Florida, las direcciones de correo electrónico son registros públicos. Si no desea que su correo electrónico se divulgue como respuesta a una solicitud de registros públicos, no envíe un correo electrónico a esta entidad. En su lugar, póngase en contacto con esta oficina por teléfono o por escrito. -- F.S. 668.6076

From: Rules for Deplorables <cathi@rulesfordeplorablesbook.com>
Sent: Tuesday, August 13, 2024 7:34 PM
To: Mail, Election <election@votepinellas.gov>; Chase, Dustin <dchase@votepinellas.gov>; Marcus, Julie <jmarcus@votepinellas.gov>
Subject: public records request

AMENDMENT C

Form Name: View Web Absentee Request
Captured: 8/26/2024 8:48:51

View Web Absentee Request

Print Console Voters Help Exit

Print 107052957 CATHI CHAMBERLAIN 10525 SAN FERNANDO BLVD NE
Mailing Address 1 Mailing Address 2 City State Zip Country

Voter Classification Civilian, Domestic
Email Address cathichamberlain2022@gmail.com
Phone Number 7273207716 Submitted Date: May/15/2023 DLN# [redacted] Last4SSN# [redacted]

Absentee Ballot Address
Line 1
Line 2
Line 3
City
State Zip
Country
Fax

Requester Information
First Name
Last Name
Address
Relationship
DLN#
Last4SSN# [redacted]

Voter provided UOCAVA Address
Remarks

Requested Delivery Mail

VR Systems Voter Focus

AMENDMENT D

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____ / ____ / _____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____ / _____ / _____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____ / _____ / _____
The voter directly instructed me to make this request for them.

AMENDMENT E

Complete the form to:

- Check the status of your mail ballot
- View where to vote on Election Day
- View sample ballots
- See upcoming elections
- Review update your voter registration information
- Review your voting activity for the past 12 months

2024 Primary Election

Voter Status: You are scheduled to receive a mail ballot for this election.

View Sample Ballot

Your Mail Ballot Information

Ballot 1 Status

1 REQUESTED > 2 SENT > 3 RECEIVED > 4 COUNTED

Ballot 1 Requested by Voter

Date Requested: Sunday, June 23, 2024

Ballot Destination:

10530 SAN FERNANDO BLVD NE
ST PETERSBURG, FL 33702

Election Day Polling Location:

Epiphany Ukrainian Catholic Church
4331 9th Ave N
St Petersburg, FL 33703

View Early Voting Locations

Important Dates

Election Day: Tuesday, August 20, 2024
Registration Closes: Monday, July 22, 2024
Early Voting Begins: Saturday, August 10, 2024
Early Voting Ends: Sunday, August 18, 2024

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I, [Your Full Name] Robert A. Ferri, being duly sworn, depose and say:

1. Personal Information:

- I am a resident of Pinellas County, Florida.
- My current address is [Your Full Address] 7602 Ridge Rd. Seminole FL 33772.
- My date of birth is [Your Date of Birth] 08/12/1956.

2. Statement of Facts:

- On [Date You Received the Ballot] 06/23/24, I received a vote-by-mail ballot at my residence.

- I did not request a vote-by-mail ballot for the 2024 Primary Election on 06/23/2024.

- I have not authorized anyone to request a vote-by-mail ballot on my behalf on 06/23/2024.

- I have confirmed with that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

- I did not sign a DS-DE 160 Form requesting a Vote-By-Mail Ballot a copy of attached.

3. Conclusion:

- To the best of my knowledge, this vote-by-mail ballot was sent to me without my request or authorization.

- I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on [Date] 8/14/24 at Clearwater, FL. [City, State].

[Your Full Name] Robert A. Ferri

[Your Signature] Robert A Ferri

NOTARY ACKNOWLEDGMENT

STATE OF FLORIDA

COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me by means of ✓ physical presence or ___ online notarization, this 14th day of August, 2024, by [Your Full Name].

Christine Peters

(Signature of Notary Public)

Christine Peters

(Name of Notary, typed, printed, or stamped)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ___ OR Produced Identification ✓

Type of Identification Produced: DL [redacted]

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____ / ____ / ____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☒ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____ / _____ / _____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____ / _____ / _____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Robin Devine, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

12760 Indian Rocks Rd Unit 571 Largo FL 33774

2. On approx 8/10/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 14, ____, 2024.

Robin L Devine
Signature

Robin L. Devine
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 14th day of August, 2024, by Robin L. DeVine.

Christine Peters
(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☐OR
Produced Identification ☐

D [redacted]
Type of Identification Produced

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Valerie Schoeman, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is: 2533 Skipper Trl, Clearwater, FL 33761.

2. On or about July 16th, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 26th, 2024.

Signature

Valerie Ann Schoeman

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 26th
day of August, 2024, by Valerie Ann Schoeman.

(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2026

Personally Known ☐OR
Produced Identification ☑

FL-DL [redacted]

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot:
(only if different than home address)

_____ **City:** _____

State: _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** ____/____/____
The voter directly instructed me to make this request for them.

DS-DE 160 (eff. 04/17/2024

Rule 1S-2.055, F.A.C.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Nikki Schoeman, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

2533 Skipper Trl, Clearwater, FL 33761.

2. On or about July 16th, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 26th, 2024.

Nikki Schoeman
Signature

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 26th
day of August, 2024, by Nikki Schoeman.

Christine Peters
(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☐ OR
Produced Identification ☑

FL DL [redacted]
Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____ / ____ / ____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot:

(only if different than home address)

_____ **City:** _____

State: _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____ / _____ / _____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____ / _____ / _____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Vernon C. Verigan, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

10630 - 95 ST. N, SEMINOLE, FL 33777.

2. On OR ABOUT 7-16-24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on AUGUST, 26, 2024.

Signature

VERNON CLARE VERIGAN

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 26th day of August, 2024, by Vernon Verigan.

(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☐OR
Produced Identification ☑

FL-DL [redacted]

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62 F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

DS-DE 160 (eff. 04/17/2024

Rule 1S-2.055, F.A.C.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Nancy Verigan, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

10630-95th St. N. Seminole, FL 33777.

2. On or about July 16th, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on July, 26, 2024.

Nancy Ann Verigan
Signature

Nancy Ann Verigan
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 26th
day of August, 2024, by Nancy Ann Verigan.

Christine Peters
(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

NOTARY PUBLIC STATE OF FLORIDA
CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☐ OR
Produced Identification ☑

FL-DL [redacted]
Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62 F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot:
(only if different than home address)

_____ **City:** _____

State: _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

DS-DE 160 (eff. 04/17/2024

Rule 1S-2.055, F.A.C.

Gmail

Christopher Gleason <gleasonforpinellas@gmail.com

24-3717CI

UBLIC RECORDS REQUEST- VOTE BY MAIL BALLOT REQUESTS

hristopher Gleason <gleasonforpinellas@gmail.com> Wed, Jul 17, 2024 at 12:05 F
: Matt <masmith@votepinellas.gov>, Dustin Chase <dchase@votepinellas.gov>, OECS@dos.myflorida.com, publicrecordsrequest ublicrecordsrequest@votepinellas.gov>, Maria.Matthews@dos.myflorida.com, "Byrd, Cord" <cord.byrd@dos.myflorida.com>
[redacted]

FILED
ST. PETERSBURG BRANCH
CLERK OF CIRCUIT COURT
2024 AUG 20 PM 2:34

Dear Custodian of Records,

I am writing to submit an open records request under the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes seeking access to public records, Florida State Election Records, and Federal Election Records related to the following:

- Copies of any and all Logs, List(s) and/or documents of the Pinellas County Voters who have requested a Vote by Mail Ballot be mailed to them for the August 20th Primary Election

I am requesting these public records in the electronic file format .PDF.

I understand that some of this information may already be publicly available, but I are seeking the official and comprehensive records directly from the county's election authorities to ensure accuracy and completeness.

Please consider this letter as a formal request for disclosure under the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes.

Please provide these records in a format that is consistent with the requirements of the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes If possible, We request that the records be provided electronically, via email or a secure file-sharing platform.

If portions of the requested records are exempt from disclosure under the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes, please provide us with a written explanation of the specific legal basis for any redactions or withholdings.

We request that this public records request be processed promptly and in accordance with the statutory timelines for response and production of records under the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes.

I hereby certify that I will not:

(A) Use any list of name(s) or addresses contained in or derived from the records or information for the purpose of selling or offering for sale any property or service to any person listed or to any person who resides at any address listed

(B) Sell, give, or otherwise make available to any person any list of name(s) or addresses contained in or derived from the records or information for the purpose of allowing that person to sell or offer for sale any property or service to any person listed or to any person who resides at any address listed.

As per Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes, we expect a prompt response to this request. If, for any reason, you cannot comply with this request within the specified timeframe, please provide a written explanation for the delay and indicate when we can expect the records to be made available.

Please take appropriate steps to ensure that records responsive to this request are not deleted by your office before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records. To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner and that extraneous costs are not incurred.

By working together at the outset, The Justice Society and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in electronic format by email or via a shared online drive.

Warmest Regards,

Christopher Gleason

Candidate for Supervisor of Elections Pinellas County, Florida

Gmail

Christopher Gleason <gleasonforpinellas@gmail.com

UBLIC RECORDS REQUEST- VOTE BY MAIL BALLOT REQUESTS

hase, Dustin <dchase@votepinellas.gov> Thu, Jul 25, 2024 at 4:01 P
: "GleasonforPinellas@gmail.com" <gleasonforpinellas@gmail.com>, [redacted]
: publicrecordsrequest <publicrecordsrequest@votepinellas.gov>

Dear Mr. Gleason,

As a candidate with opposition, you are entitled to the list of mail ballot requests after filing your oath of acquisition.

Additionally, please be advised that fulfilling your request as stated would require an estimated 18,000 hours to compile the logs and documents for each voter who requested a mail ballot. Given this substantial time requirement, there will be significant costs associated with the retrieval, review, and redaction of these records.

Under Florida law, we are permitted to charge a special service fee for the extensive use of information technology resources and/or clerical or supervisory assistance required to process your request. The estimated cost for fulfilling your request will be provided upon determining the exact scope and volume of records responsive to your request. Please note that these costs are based on actual labor and resources incurred by the Supervisor of Elections Office.

We are prepared to work with you to narrow the scope of your request to make it more manageable and cost-effective. For instance, if there are specific types of logs or subsets of information you are most interested in, please let us know so we can focus our efforts accordingly.

Furthermore, please be informed that any exempt or confidential information will be redacted in accordance with the applicable Florida Statutes.

To proceed, we invite you to either narrow the scope of your request to reduce the estimated time and resources required, or we can provide a full cost estimate for processing the entire request as currently stated. Please let us know your preference and any specific subsets of the requested information you are requesting. If a response is not received within 30 days of this correspondence, we will consider the request closed.

Sincerely,

Dustin Chase, Deputy Supervisor of Elections

Representing Julie Marcus, Pinellas County Supervisor of Elections

13001 Starkey Rd., Largo, FL 33773

Phone: (727) 464-4988

Fax: (727) 464-6239

dchase@votepinellas.gov

Follow us @VotePinellas

Like us on Facebook

Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. – F.S. 668.6076

24-3717C I

FILED
ST. PETERSBURG BRANCH
2024 AUG 20 PM 2:34
KEN BURKE
CLERK OF CIRCUIT COURT

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, JAMES M. BROWN JR, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

100 BLUFF VIEW DR. APT 211A BELLEAIR BLUFFS FL 33770

2. On OR ABOUT JULY 16, 2024, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 19, 2024.

James M. Brown JR
Signature

JAMES M. BROWN JR
Full Name

STATE OF FLORIDA
COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 19th day of August, 2024, by James M. Brown Jr.

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Christine Peters
(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Ann Whisler, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:
99 Dolphin DR N. Oldsmar, FL 34677.

2. On or about 7/6/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 16, ____, 2024.

Ann Whisher
Signature

Ann Whisher
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 16 day of August, 2024, by Ann Whisher.

Christine Peters
(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496853
Expires February 26, 2028

Christine Peters
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Kathleen A. Shanks, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

2755 Curlew Rd Lot 76 Palm Harbor, FL 34684.

2. On or about July 16, 24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on 08-27, ____, 2024.

Kathleen A Shanks
Signature

Kathleen A. Shanks
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 27th
day of August, 2024, by Kathleen A. Shanks.

Christine Peters
(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Print, Type, or Stamp Commissioned
Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ Date: ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

☐ Spouse
☐ Parent
☐ Child
☐ Grandparent
☐ Grandchild
☐ Sibling
☐ Parent of voter's spouse
☐ Child of voter's spouse
☐ Grandparent of voter's spouse
☐ Grandchild of voter's spouse
☐ Sibling of voter's spouse
☐ Voter's legal guardian
☐ Designee for a voter with a disability

Designee's Signature: _____ Date: ____/____/____
The voter directly instructed me to make this request for them.

DS-DE 160 (eff. 04/17/2024

Rule 1S-2.055, F.A.C.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Karol Kay Pravda, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is: 1500 Edna Ave. NW, Largo, FL. 33770.

2. On about July 16, 2024 I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 27, 2024.

Karol Kay Pravda
Signature

Karol Kay Pravda
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 27th
day of August, 2024, by Karol Kay Pravda.

Christine Peters
(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ mailing address in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** ____/____/____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, THOMAS ROMANO, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

5313 18th ST. NE. ST. PTE FL 33703.

2. On OR ABOUT July 16th, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 27, 2024.

Signature

THOMAS G. ROMANO
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 27th day of August, 2024, by Thomas Romano.

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☒ AP

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ Date: ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ Date: ____/____/____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Rhonda Romano, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

5313 18th St. NE.

2. On or about July 6, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 27, 2024.

Rhonda Romano
Signature

Rhonda Romano
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 27th
day of August, 2024, by Rhonda Romano.

Christine Peters
(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ Date: ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ Date: ____/____/____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, MAUREEN ZILLES, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

8392 Meadowbrook Dr East, Largo, FL 33777.

2. On or about 7/25/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 28, 2024.

Signature

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 28th day of August, 2024, by Maureen Zilles.

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, LouAnn M. Rice on Behalf of Simone M Rice (mother) Now Deceased, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

1209 E. Boyer St., Tarpon Springs, FL 34689.

2. On or about 7/16/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot. → on behalf of my mother

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on Aug 29th, ____, 2024.

Signature on behalf of Simone M. Rice

LouAnn M. Rice
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 29th day of August, 2024, by LouAnn Marie Rice.

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62 F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

LouAnn Rice

1209 E Boyer St.

Tarpon Springs, FL 34689

(also Simone Rice's address)

8/27/2024

Reference:

Simone Marie Rice's Request for a mail in ballot 6/23/2024, as seen on Pinellas County web site.

At age 90 and a few years previous, I helped my mother obtain her mail in vote when she was not capable.

I also drove my mother to the polls to turn in her mail in ballot and vote later when she was capable.

This week I looked back I looked back at files I had because I could not remember re-requesting a mail in ballot this spring as I understand was required if mom wanted to continue to vote by mail.

Initially I mistakenly saw in my files the Vote by mail ballot envelope I copied 2/22/2024 and thought that was it but it was actually her return envelope for the 2024 Presidential Primary.

I am sure I would have saved a copy of the website page confirming if I had RE-requested to continue her voting by mail but I have none and know I put it off because I was unsure about my mother's multiple health issues at that point, June 2024.

By June 23rd 2024, the supposed date my mother requested to continue with Mail-In Voting, my mother was on a fast decline.

Simone had been on pain killers and recently anti-depressants both making wading through political conversation impossible and un-important.

My mother was bed ridden since her last operation, had no computer and was incapable of using her smart phone to navigate to any website.

I swear, because of her state of health, there is **No Way** I requested a Mail in ballot for my mother on June 23rd , 2024.

I knew she would not last much longer and unfortunately was proven to be correct as she passed away 16 days later.

I still have the unopened mailed ballot received shortly before she passed.

I do not see any Postal Stamped Date indicating when it was mailed.

LouAnn M Rice

JULIE MARCUS
SUPERVISOR OF ELECTIONS
PINELLAS COUNTY
13001 Starkey Rd., Largo FL 33773-1416

OFFICIAL ELECTION MAIL
Authorized by the U.S. Postal Service

NON PROFIT ORG
US POSTAGE
PAID
ST. PETERSBURG, FL
PERMIT #4020

OFFICIAL BALLOTING MATERIAL
FIRST-CLASS MAIL

DO NOT FORWARD

SIMONE M RICE

1209 E BOYER ST TARPON SPRINGS FL 34689

84270000150

9114 5112 5703 1408 1427 2547

G113

SIMONE M RICE
1209 E BOYER ST
TARPON SPRINGS FL 34689

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Nancy Skinner-Eriksson, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

1449 Ridge Shore Dr Tarpon Spngs Fl 34689

2. On or about 7-16-24 I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 29, 2024.

Nancy Skinner-Ericsson
Signature

Nancy Skinner-Ericsson
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 29th
day of August, 2024, by Nancy Skinner-Ericsson

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Christine Peters
(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned
Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Christina M. Ott, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

3300 Fox Chase Cir #216 Palm Harbor FL 34683

2. On July 16 2024, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on Aug 27, 27, 2024.

Signature

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 27th day of August, 2024, by Christina Ott.

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot:
(only if different than home address)

_____ **City:** _____

State: _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Marianne Segal, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

2416 World Parkway Blvd #14 Clearwater, FL. 33763

2. On July 16, 2024, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on Aug 24, 24, 2024.

Signature

Marianne Segal
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 24th day of August, 2024, by Marianne Segal.

(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

Filing # 221011797 E-Filed 04/15/2025 09:01:24 AM

IN THE DISTRICT COURT OF APPEAL OF FLORIDA, SECOND DISTRICT

Case Nos.: 2D2024-2687
Case Nos.: 2D2024-2688

Christopher Gleason,
Appellant/Petitioner, Pro Se,
v.
Julie Marcus, et al.,
Appellees/Respondents.

MEMORANDUM OF LAW IN SUPPORT OF EMERGENCY MOTION TO DISQUALIFY JUDGES, TO VACATE CONFLICTED RULINGS, FOR STAY OF PROCEEDINGS, AND FOR COORDINATION OF RELATED CASES

COMES NOW, Christopher Gleason, pro se Appellant/Petitioner, pursuant to Florida Rules of Appellate Procedure 9.100 and 9.045, and Florida Rule of Judicial Administration 2.330, in support of his Emergency Motion to disqualify Judges Nelly N. Khouzam, Morris Silberman, Craig C. Villanti, Anthony C. Black, Edward C. LaRose, and Susan H. Rothstein-Youakim (Second District), and Judges Patricia Muscarella, Peter Ramsberger, and Shawn Crane (Sixth Circuit); to vacate their rulings in Case Nos. 2D2024-2687, 2D2024-2688, 522024CA003717XXCICI, and 522024CA003995XXCICI; to stay proceedings; and to coordinate Case Nos. 2D2024-2687 and 2D2024-2688. Systemic vote-by-

mail (VBM) fraud, evidenced by Gleason's affidavit (Exhibit A), creates structural error, mandating relief to protect due process and public trust.

I. INTRODUCTION

VBM fraud targeting 56 judicial officers (Exhibit A, Paragraph 16) compromises impartiality, risking void rulings across four cases. Gleason's evidence—219,673 unverified VBM requests (Exhibit A, Paragraph 12)—shows judges as victims, witnesses, or election beneficiaries, creating bias under In re Murchison, 349 U.S. 133 (1955), Tumey v. Ohio, 273 U.S. 510 (1927), Aetna Life Insurance Co. v. Lavoie, 475 U.S. 813 (1986), and Rippo v. Baker, 580 U.S. 285 (2017). Disqualification, vacatur, a stay, and coordination are essential to ensure a fair tribunal.

II. FACTUAL BACKGROUND

1. VBM Fraud: Gleason, an election systems analyst, obtained Florida Division of Elections' "Vote By Mail Early Voting Reports" (Exhibit B), revealing 219,673 unverified VBM requests on June 23, 2024 (99% of statewide total), and 196,037 on September 9, 2024, flagged "N" (no ID) in FVRS (Exhibit A, Paragraphs 3, 12). Requests targeted Judges Khouzam (Voter ID: 106723453), Silberman (106869196), Villanti (113787369), Muscarella, and Crane's assistant, Louise Smith (Exhibit A, Paragraph 16). Gleason attests

this scale requires “bots, automated or insider manipulation” (Exhibit A, Paragraph 20).

2. Protected Voters: Khouzam and others, protected under F.S. § 97.0585, faced bypassed verification (Exhibit A, Paragraphs 4-5; Exhibit I). June 23 requests occurred on a closed Sunday (Exhibit C; Exhibit A, Paragraph 6), rendering them impossible absent fraud.

3. Judicial Assistants and Ties: Smith and Ramsberger’s son and daughter-in-law faced fraud (Exhibit A, Paragraph 16; Exhibit A to Motion). Silberman’s marriage to Khouzam entrenches bias (Motion, Page 4, Paragraph 6).

4. Election Benefits: Black, LaRose, and Rothstein-Youakim secured retention (68.6-69.7% “yes”) in a tainted election, earning over $200,000 (Exhibit B; Exhibit A, Paragraph 12; Motion, Page 4, Paragraph 7).

5. Voter Affidavits: Eighteen voters swore they did not request VBM ballots, yet received them, mirroring judicial victimization (Exhibit Q; Exhibit A, Paragraph 12).

6. Systemic Scope: Exhibit O lists 56 affected officers, including 17 Sixth Circuit judges and assistants, indicating a coordinated scheme (Exhibit A, Paragraph 16).

7. Obstructed Evidence: The Supervisor claimed producing FVRS logs would take 19,000 hours, despite automation, suggesting concealment (Exhibit A, Paragraph 11).

III. LEGAL ANALYSIS

A. Disqualification for Structural Error

Rule 2.330(d)(1)-(2) and Canon 3E(1) mandate disqualification for knowledge, bias, or apparent partiality. In re Murchison requires an "appearance of justice" (349 U.S. at 136), while Tumey, Ward v. Village of Monroeville, 409 U.S. 57 (1972), Aetna, and Rippo deem financial, institutional, personal, or potential biases structural errors.

1. Victims/Witnesses: Khouzam, Silberman, Villanti, and Muscarella faced unverified requests (Exhibit A, Paragraph 3), making them witnesses. Aetna requires recusal for personal stakes (475 U.S. at 824), as rulings could affect their voter records (Exhibit A, Paragraph 5). Rippo mandates disqualification for an "objective risk" of bias (580 U.S. at 287), present here due to 219,673 requests' statistical impossibility (Exhibit A, Paragraph 20). Crane's assistant, Smith, faced fraud (Exhibit A, Paragraph 16), creating institutional bias under Ward (409 U.S. at 60). Murchison prohibits witness-judge roles (349 U.S. at 137).

2. Familial Ties: Silberman's marriage to Khouzam (Motion, Page 4, Paragraph 6) violates Canon 3E(1)(d). Ramsberger's family's victimization risks bias, akin to Ward's institutional conflict (409 U.S. at 60).

3. Financial Stakes: Black, LaRose, and Rothstein-Youakim's retention (Exhibit A, Paragraph 12) mirrors Tumey's financial bias (273 U.S. at 523) and Caperton's "probability of bias" (556 U.S. 868, 884 (2009)).

B. Vacatur of Tainted Rulings

Williams v. Pennsylvania (136 S. Ct. 1899, 1908 (2016)) and Liljeberg (486 U.S. 847, 861 (1988)) mandate vacatur for bias. Aetna voids rulings with personal stakes (475 U.S. at 824). Sullivan v. Louisiana holds structural errors defy harmless error review (508 U.S. 275, 279 (1993)). Conflicted judges' rulings (Exhibit A, Paragraph 16) are defective, as fraud evidence (Exhibit B; Exhibit Q; Exhibit A, Paragraph 12) confirms entanglement. The Supervisor's refusal to produce logs (Exhibit A, Paragraph 11) warrants an adverse inference (Baxley v. State, 699 So. 2d 1313, 1316 (Fla. 1997)), implying logs would reveal fraud, necessitating vacatur in Case Nos. 2D2024-2687, 2D2024-2688, 522024CA003717XXCICI, and 522024CA003995XXCICI (Chastine v. Broome, 629 So. 2d 293, 295 (Fla. 4th DCA 1993)).

C. Stay to Prevent Harm

Rule 9.310 authorizes stays to avoid irreparable harm. DuraStress, Inc. v. Law supports halting proceedings when rights are threatened (634 So. 2d 769, 770 (Fla. 5th DCA 1994)). Gleason's evidence—219,673 unverified requests and 18 affidavits (Exhibit A, Paragraph 12)—ensures success likelihood. Marks v. Stinson (19 F.3d 873, 887 (3d Cir. 1994)) and Bush v. Gore (531 U.S. 98, 111 (2000)) emphasize election integrity, justifying a stay to prevent void rulings and enable log production under F.S. § 119.11 (Exhibit A, Paragraph 23; League of Women Voters v. Detzner, 172 So. 3d 363, 390 (Fla. 2015)).

D. Coordination and Reassignment

Rule 2.545 permits coordination for efficiency. Consolidating Case Nos. 2D2024-2687 and 2D2024-2688 avoids inconsistent fraud rulings, critical to public trust (Marks, 19 F.3d at 887). Systemic conflicts (Exhibit A, Paragraph 16) require reassignment or Supreme Court certification (Art. V, § 2(b), Fla. Const.), as Ward warns against institutional bias (409 U.S. at 60).

IV. PROCEDURAL COMPLIANCE

The motion complies with Rule 2.330(e), filed within 30 days of April 11, 2025 (Exhibit A, Paragraph 11), and Rule 9.045(e), using 14-point Times New Roman font. The emergency basis rests on fraud evidence (Exhibit A, Paragraphs 3, 12, 16).

V. CONCLUSION

VBM fraud affecting judges (Exhibit A, Paragraph 3) creates structural error under Murchison, Tumey, Ward, Aetna, and Liljeberg. Disqualification, vacatur, a stay, and coordination are essential to restore impartiality. Gleason requests:

1. Disqualification of named judges.
2. Vacatur of their rulings.
3. A stay of proceedings.
4. Coordination and reassignment.
5. An order compelling FVRS log production (F.S. § 119.11).

Respectfully submitted,

/s/ Christopher Gleason

2098 Seminole Boulevard, #6212
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com
Date: April 15, 2025

CERTIFICATE OF SERVICE

I certify service via Florida Courts E-Filing Portal, U.S. Mail, and/or email on April 15, 2025, to:

- Clerk of the Second District Court of Appeal
- Clerk of the Sixth Judicial Circuit
- Jared N. Kahn, Esq. (jkahn@pinellas.gov)
- Kelly L. Vicari, Esq. (kvicari@pinellas.gov)
- Jeffrey N. Klein, Esq. (eservice@pinellas.gov)

/s/ Christopher Gleason

CERTIFICATE OF COMPLIANCE

This Memorandum complies with Rule 9.045(e), using 14-point Times New Roman font.

/s/ Christopher Gleason

Filing # 221001287 E-Filed 04/15/2025 02:48:37 AM

IN THE DISTRICT COURT OF APPEAL OF FLORIDA, SECOND DISTRICT

Case No.: 2D2024-2687
Case No.: 2D2024-2688

Christopher Gleason
Appellant/Petitioner, Pro Se,

v.

Julie Marcus, et al.
Appellees/Respondents.

MOTION TO DISQUALIFY JUDGE NELLY N. KHOUZAM

COMES NOW, Christopher Gleason, pro se Appellant/Petitioner, pursuant to Florida Rule of General Practice and Judicial Administration 2.330, Florida Rule of Appellate Procedure 9.430, Florida Statutes §§ 38.02 and 38.10, and Canon 3E of the Florida Code of Judicial Conduct, and respectfully moves this Honorable Court to disqualify the Honorable Nelly N. Khouzam from the appellate panel assigned to this matter. In support, I state the following:

1. This motion arises from Judge Khouzam's involvement, as both a material witness and a victim, in the vote-by-mail fraud scheme that

is the central subject of this appeal. Her status raises a reasonable and well-grounded fear that she cannot remain impartial in adjudicating this matter.

2. Official records from the Florida Department of State, Division of Elections 'Vote By Mail Early Voting Reports' (Exhibit B) show that vote-by-mail requests were submitted under Judge Khouzam’s name on June 23, 2024 (a Sunday), and again on September 9, 2024.
3. Judge Khouzam is a protected voter under Florida Statutes § 97.0585. As such, her personal data is confidential, and online requests may not be made without her direct involvement, family, or legal guardian. Her name appearing on vote-by-mail reports as having unverified ballot requests, flagged with an 'N' for no verified ID, supports that these were unauthorized and fraudulent.
4. June 23, 2024, was a Sunday, when the Supervisor of Elections office was closed (Exhibit C), making in-person or phone requests legally impossible per Rule 1S-2.055(3)(b) and § 101.62(1)(b).
5. The September 9, 2024, request was not only unverified but duplicative. Rule 1S-2.055(3)(d) extends a vote-by-mail request through the end of 2026, barring cancellation. The duplicate request

indicates an anomalous or fraudulent entry, confirmed by Voter Focus and FVRS logs (Exhibits D and E).

6. Exhibit H, an affidavit by 2024 Senate candidate John Siamas, confirms that Judge Khouzam's entries were part of a larger pattern of fraud affecting over 56 judicial officers across three court levels, including eight 2nd DCA judges and five Florida Supreme Court justices.
7. Under Rule 2.330(d)(1), disqualification is required if the judge has personal knowledge of disputed evidentiary facts. Canon 3E(1)(a) similarly mandates disqualification where the judge is likely to be a material witness. Both conditions are satisfied here.
8. A reasonably prudent person, knowing that Judge Khouzam's name was used in a potentially criminal act central to this appeal, would justifiably question her impartiality. This creates a well-grounded fear of judicial bias under Rule 2.330, Florida Statutes § 38.10, and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009).
9. The motion is filed timely, within 30 days of April 11, 2025, the date I discovered these facts in the public report (Exhibit B), as required by Rule 2.330(e).

10. Attached as Exhibit O is a summary chart identifying judges and judicial assistants whose vote-by-mail ballots were fraudulently requested without verified ID. In many instances, judicial assistants—not just judges—were targeted. Because judicial assistants serve as confidential agents of their assigned judges, their involvement implicates those judges directly under Rule 2.330(d)(1). Even if a judge's own record is unaffected, the fraud involving their immediate chambers support staff constitutes a material witness situation, mandating disqualification. Exhibit O reinforces the widespread nature of the taint and the unavoidable structural error across the reviewing tribunal. As recognized in Caperton and Williams, a judge must be disqualified where either they or close agents are materially entangled in the factual controversy under review. Judicial assistants, who function as confidential agents and extensions of the judge's chambers, qualify as such under Rule 2.330(d)(1).

11. I previously filed a motion to disqualify Circuit Judge Patricia Muscarella in connection with trial-level proceedings in the Sixth Judicial Circuit. I also filed motions in the Second District Court of Appeal seeking the disqualification of Circuit Judges Peter

Ramsberger and Patricia Muscarella. The grounds raised in this motion—namely, newly discovered evidence that Judge Nelly N. Khouzam is a protected voter whose name appeared in unverified vote-by-mail request records, and that the votepinellas.gov website prevents protected voters from submitting online ballot requests—were not known to me at the time of those earlier filings. These facts came to my attention on or after April 11, 2025, upon reviewing updated election data from the Florida Department of State and receiving additional corroborating information from John Siamas. Accordingly, this motion complies with the requirements of Rule 2.330(d)(4).

12. I respectfully request that this Court disqualify Judge Khouzam and refer the matter to the Chief Judge of the Second DCA for reassignment or, in the alternative, transfer the case to another District Court of Appeal or certify to the Florida Supreme Court due to systemic judicial conflicts.

13. This case presents a classic example of structural error—a constitutional defect in the composition of the tribunal itself, which cannot be remedied by harmless error review. Structural errors violate the Due Process Clause of the Fourteenth Amendment and

require automatic vacatur of any orders entered by a compromised panel.

14. The U.S. Supreme Court has held that judicial bias and conflicts of interest rise to the level of structural error when they affect the integrity of the tribunal. In Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), the Court vacated a decision where a judge's impartiality was reasonably questioned. In Williams v. Pennsylvania, 136 S. Ct. 1899 (2016), a justice's prior involvement as a prosecutor required reversal due to a structural defect in the tribunal. In addition to Judge Khouzam's direct involvement as a victim and material witness, it must be noted that her husband and judicial colleague, Judge Morris Silberman of the Second District Court of Appeal, is also listed among the judges whose voter records were affected by the same alleged unauthorized vote-by-mail scheme. See Exhibit O.

15. Pursuant to Canon 3E(1)(d) of the Florida Code of Judicial Conduct, a judge must disqualify herself if her spouse has an interest that could be substantially affected by the outcome of the proceeding. Given that the integrity and criminality of these vote-by-mail entries are central to this appeal, Judge Silberman's status as a named victim

raises a parallel risk of bias or indirect influence upon Judge Khouzam.

16. Moreover, under Rule 2.330(d)(1), personal knowledge of disputed evidentiary facts held through a spouse—especially another judge affected by the same scheme—compounds the structural risk. The spousal relationship and overlapping victimization in this matter underscore the necessity of mandatory disqualification.

17. Courts have consistently held that even the appearance of bias rooted in familial or collegial ties is sufficient to violate due process. See Williams v. Pennsylvania, 136 S. Ct. 1899 (2016); Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009).

18. Here, Judge Khouzam is both a material witness and a victim in the very fraud alleged in this appeal. Her presence on the panel not only creates an appearance of impropriety, but also compromises the structural integrity of the appellate court. The involvement of eight additional 2nd DCA judges—whose names also appear in the fraudulent records—means that the court itself may be inherently conflicted.

19. This widespread impact prevents the formation of a constitutionally adequate tribunal. In Weaver v. Massachusetts, 137 S. Ct. 1899 (2017), the Court reaffirmed that structural errors affect the entire adjudicative process and require reversal, even without specific proof of prejudice.

20. Accordingly, Appellant respectfully requests not only disqualification of Judge Khouzam, but also vacatur of any orders issued by a conflicted panel and referral to the Chief Judge for reassignment. In the alternative, this Court should transfer the case to another District Court of Appeal or certify it to the Florida Supreme Court for appointment of a special tribunal pursuant to Article V, Section 2(b) of the Florida Constitution.

21. Appellant further requests that, to the extent any rulings or orders have already been entered by appellate panel members whose names appear in the election fraud records submitted in Exhibit H—as victims, material witnesses, or close relations of either—such orders be deemed void and vacated due to structural error. The presence of materially conflicted judges on the panel undermines the constitutional adequacy of the tribunal, and no harmless error analysis can cure this defect under *Caperton*, *Williams*, and *Weaver*.

Vacatur is therefore required to protect Appellant's right to due process.

22. The documentary evidence submitted in Exhibits A through N collectively proves that the vote-by-mail ballot requests submitted in the name of Judge Nelly N. Khouzam were unauthorized, unverifiable, and in direct violation of Florida election laws and voter protection regulations.

23. Exhibit B shows that two unverified vote-by-mail requests were submitted under Judge Khouzam's name on June 23, 2024, and September 9, 2024, each marked with an 'N' status for lack of identification. Exhibit C confirms that the June 23 request occurred on a Sunday when the elections office was closed, making legal submission impossible under Rule 1S-2.055(3)(b).

24. Exhibits D, I, and L show that protected voters cannot have online vote-by-mail requests entered unless personal identifiers are manually input and verified. These system instructions explain that staff must verify requests using secure methods, and protected voters' requests are blocked from auto-entry.

25. Exhibit I outlines the internal user interface used by elections staff to process vote-by-mail requests, and it contains key fields titled

"Requester Name," "Relationship to Voter," and "Request Date." These fields are central to verifying whether a vote-by-mail request was lawfully submitted, particularly for voters classified as "protected" under Florida Statutes § 97.0585. According to the manual, protected voters—such as Judge Nelly Khouzam—trigger red flags in the system that prevent online requests from being accepted without credentialed, manual override by staff. Additionally, the Request Date is auto-generated by the system and provides a forensic timestamp of when the request was processed. In this case, requests under Judge Khouzam's name were submitted on June 23, 2024 (a Sunday) and again on September 9, 2024, despite the fact that the Pinellas County Supervisor of Elections office was closed on June 23 (Exhibit C), and despite the existence of a valid standing request. The system should have blocked such duplicate or untimely requests. The absence of a verified "Requester Name" and legally recognized "Relationship to Voter," combined with the suspicious request dates, indicates a procedural breach or deliberate override of these safeguards. This further establishes that Judge Khouzam is a material witness to a disputed fact, and her continued participation as a judge on this appellate panel would

violate both Canon 3E(1)(a) of the Florida Code of Judicial Conduct and Rule 2.330(d)(1) of the Florida Rules of General Practice and Judicial Administration.

26. Exhibits E, F, J, K, and M prove that the VR Systems backend includes built-in tools to flag, block, or reverse questionable or fraudulent vote-by-mail requests. These include reports such as the 'Absentee Alert Report' (Exhibit M) and the 'Questionable Web Requests' report (Exhibit K), which are designed to detect improper access, repeated IP usage, or third-party manipulation.

27. Exhibit N, the 'Absentee Activity Dump' report, confirms that all vote-by-mail activity is logged at the user level, meaning election officials had access to full audit trails capable of identifying how Judge Khouzam's record was used, by whom, and when.

28. The affidavit of Appellant (Exhibit A) and the supporting affidavit of John Siamas (Exhibit H) independently corroborate that this activity was not an isolated incident, but part of a broader scheme involving protected judicial officers across multiple court levels.

29. These exhibits demonstrate that Judge Khouzam is not merely tangentially related to the facts — she is a material witness and a direct victim of the fraudulent activity under review. Her presence

on the appellate panel represents a textbook case of structural error under Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009) and Williams v. Pennsylvania, 136 S. Ct. 1899 (2016).

30. The evidence makes clear that this is not a theoretical concern. It is a legally documented breakdown in the integrity of the vote-by-mail process that directly affects the composition of the reviewing tribunal. When a judge fails to recuse under circumstances where their impartiality may reasonably be questioned—and where they are a material witness or victim of the very conduct under appellate review—the resulting proceedings are fundamentally unfair. Such non-recusal constitutes a violation of due process under the Fourteenth Amendment, as reaffirmed in Tumey v. Ohio, 273 U.S. 510 (1927), where the U.S. Supreme Court held that even a potential conflict of interest on the part of a judge violates due process, and in In re Murchison, 349 U.S. 133 (1955), where the Court emphasized that 'no man can be a judge in his own case' and condemned proceedings that carry even the appearance of partiality. Disqualification and vacatur are therefore constitutionally required, as no harmless error review can cure this defect.

WHEREFORE, Appellant respectfully requests that Judge Nelly N. Khouzam disqualify herself from the appellate panel in this matter and that the Court take further remedial action as necessary to ensure a constitutionally adequate and impartial tribunal.

CERTIFICATE OF GOOD FAITH

I HEREBY CERTIFY that this motion is made in good faith and is supported by facts and evidence that would create a well-grounded fear of bias in a reasonably prudent person, and is not made for purposes of delay or harassment.

Respectfully submitted,

/s/ Christopher Gleason
Christopher Gleason
2098 Seminole Boulevard, #6212
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com, gleasonforpinellas@gmail.com
Pro Se Appellant/Petitioner

EXHIBITS

Exhibit A – Affidavit of Christopher Gleason (April 11, 2025)

Exhibit B – Florida Department of State "Vote By Mail Early Voting Reports" (Redacted)

Exhibit C – Screenshot and Calendar Showing June 23, 2024 (Sunday) from votepinellas.gov

Exhibit D – VR Systems: "Dialog: Process Web Vote-By-Mail Requests" (Protected Voter Display)

Exhibit E – VR Systems: "About Data Files Sent to FVRS by Voter Focus"

Exhibit F – VR Systems: "How to Process Received Mail Ballot Requests"

Exhibit G – Second District Court of Appeal Judge Roster (screenshot from 2dca.flcourts.gov)

Exhibit H – Affidavit of John Siamas (April 7, 2025)

Exhibit I – VR Systems Manual: "Dialog: Vote-By-Mail Request"

Exhibit J – VR Systems Manual: "About Capturing Questionable Vote-By-Mail Requests from the Web"

Exhibit K – VR Systems Report: "Questionable Web Requests for an Election"

Exhibit L – VR Systems Dialog: "Mail-Ballot Adjustments"

Exhibit M – VR Systems Report: "Absentee Alert Report"

Exhibit N – VR Systems Report: "Absentee Activity Dump"

Exhibit O - Summary of Affected Judicial Officers and Staff

Exhibit P – Pinellas Protected Voter Block

Exhibit Q – Voter Affidavits

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Disqualify Judge Nelly N. Khouzam was served via the Florida Courts E-Filing Portal, or by U.S. Mail and/or email where appropriate, on April 14, 2025, to the following:

- Clerk of the Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- Clerk of the Sixth District Court
- The Honorable Judge Nelly N. Khouzam, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- Jared N. Kahn, Esq., Attorney for Appellee Julie Marcus (jkahn@pinellas.gov) (eservice@pinellas.gov)
- Kelly L. Vicari, Esq., Attorney for Appellee Julie Marcus (kvicari@pinellas.gov) (eservice@pinellas.gov)
- Jeffrey N. Klein, Esq. – Attorney for Appellee Pinellas County Canvassing Board (eservice@pinellas.gov)

Respectfully submitted,

/s/ Christopher Gleason
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Pro Se Appellant/Petitioner

CERTIFICATE OF COMPLIANCE

This motion complies with Rule 9.045(e), using 14-point Times New Roman font.

/s/ Christopher Gleason

Christopher Gleason

EXHIBIT A:

Christopher Gleason Affidavit April 11, 2024

IN THE DISTRICT COURT OF APPEAL OF FLORIDA, SECOND DISTRICT

Case No.: 2D2024-2687

Case No.: 2D2024-2688

Christopher Gleason
Appellant/Petitioner, Pro Se,

v.

Julie Marcus, et al.
Appellees/Respondents.

AFFIDAVIT OF CHRISTOPHER GLEASON IN SUPPORT OF MOTION TO DISQUALIFY JUDGE NELLY N. KHOUZAM

STATE OF FLORIDA
COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Christopher Gleason, who, being duly sworn, deposes and says:

1. I am the Appellant/Petitioner in the above-captioned matter and make this affidavit in support of my Motion to Disqualify Judge Nelly N. Khouzam.

2. I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and belief.

3. I obtained the official election records from the Florida Department of State, Division of Elections titled *Vote By Mail Early Voting Reports* (Exhibit B), from the Florida State Secretary of State Division of Elections website at the

following secure download URL: (https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports). These public records/ election records showed that vote-by-mail requests were submitted in the name of Judge Nelly N. Khouzam on June 23, 2024, and again on September 9, 2024.

4. Judge Khouzam is a protected voter under Florida Statutes § 97.0585, meaning her voter information is confidential and cannot be accessed or used for vote-by-mail ballot requests without verified identity and legal authorization.

5. These vote-by-mail requests were flagged as "N" (no verified ID) in the Florida Voter Registration System (FVRS), confirming they were submitted without the legally required authentication.

6. The June 23, 2024, request was made on a Sunday, a day on which the Pinellas County Supervisor of Elections office was closed (Exhibit C), making in-person or phone requests legally impossible. Moreover, Exhibit I (VR Systems Manual: Vote-By-Mail Request Dialog) confirms that protected voters cannot submit online requests without manual override by staff with elevated credentials.

7. VR Systems' internal user manual (Exhibit I) explains that protected voter profiles—such as Judge Khouzam's—trigger automatic flags that prevent any online vote-by-mail request submission. These records can only be modified through elevated access credentials by elections staff. Furthermore, as outlined in Exhibit E and F, Voter Focus software requires manual identity verification and restricts processing of such requests to specific user roles with administrative clearance. Exhibit I (VR Systems Manual: Vote-By-Mail Request Dialog) explicitly states that protected voter profiles, per F.S. § 97.0585, are blocked from online VBM submissions to prevent unauthorized access. Any request requires manual entry by staff with elevated credentials, logged with user ID and timestamp (Exhibit N). Thus, the June 23, 2024, request for Judge Khouzam, and 219,673 others including protected voters, is legally impossible absent unauthorized override.

8. According to Rule 1S-2.055(3)(d), a valid vote-by-mail request remains active through December 31, 2026. Thus, the September 9, 2024, request was not only unverified but also redundant and indicative of a procedural breach or unauthorized override.
9. Rule 1S-2.043(2)(a) of the Florida Administrative Code requires that any vote-by-mail request contain "the name, address, and date of birth of the

voter and the requestor, if different." Such criteria were not met in either of Judge Khouzam's VBM entries, further supporting the conclusion of procedural violation.

10. Exhibit I further describes that each VBM request requires fields for the "Requester Name," "Relationship to Voter," and an auto-generated "Request Date." The absence of valid requester data and the use of blocked channels for a protected voter supports the conclusion that these requests were fraudulent.

11. Additionally, Exhibit N (Absentee Activity Dump) confirms that the Florida Voter Registration System maintains a comprehensive log of all VBM activity, including the user ID, timestamp, and method of submission. These audit logs would pinpoint exactly when and how Judge Khouzam's VBM entries were created or modified—offering forensic confirmation of unauthorized access. I requested Absentee Ballot Request Information logs from the Pinellas County Supervisor of Elections to verify the June 23, 2024, entries (Exhibit N). The Supervisor claimed production would take 19,000 hours, despite VR Systems' automated daily uploads to FVRS (Exhibit E). This refusal violates F.S. § 838.022 and F.S. § 119.07 and suggests concealment of evidence confirming fraudulent entries, including Judge Khouzam's, warranting an adverse inference that logs would reveal

unauthorized access. F.S. § 119.11 requests filed, Supervisor of Elections 19,000 hours claim is baseless (Times Publ'g Co.).

12. Based on additional information provided by John Siamas (Exhibit H), a 2024 Florida Senate candidate, this case forms part of a larger pattern of vote-by-mail fraud affecting over 56 judicial officers, including Judge Khouzam and multiple members of this appellate court. John Siamas (Exhibit H) identified 219,673 unverified VBM requests on June 23, 2024, from Pinellas County, comprising 99% of statewide requests, with 219,628 lacking ID verification (Exhibit B). Over 56 judicial officers, including protected voters like Judge Khouzam, were targeted, violating F.S. § 97.0585. This unprecedented spike, on a Sunday when no verification was possible (Exhibit C), indicates a coordinated scheme compromising the Second DCA and Sixth Circuit's impartiality. The 219,673 requests on June 23, 2024, a Sunday, represent a statistically impossibility for legitimate voter activity, particularly for protected voters barred from online submissions (Exhibit I), confirming fraudulent intent. I obtained signed affidavits from 18 voters, attesting they did not request VBM ballots on June 23, 2024, yet received them (Exhibit Q). These confirm unauthorized FVRS entries, mirroring Judge Khouzam's unverified request (Exhibit B) and John

Siamas's data of 219,673 illegal requests (Exhibit H). As protected voters are blocked from online submissions (Exhibit I), these ballots violate F.S. § 97.0585, F.S. § 101.62, F.S. 104.0616, evidencing a fraudulent scheme compromising judicial impartiality. League of Women Voters v. Detzner, 172 So. 3d 363 (Fla. 2015), condemns election concealment. The 219,673 unverified requests (Exhibit B), Judge Dubbeld's non-consent (¶18), 18 affidavits (Exhibit P), and 19,000-hour log delay (Exhibit E) evidence fraudulent intent, violating F.S. § 104.0616. Marks v. Stinson, 19 F.3d 873 (3d Cir. 1994), voids elections for VBM fraud. The 219,673 unauthorized requests (Exhibit B), including Judges Khouzam and Dubbeld (¶18), with 18 affidavits (Exhibit P), violate due process, requiring tribunal recusal and vacatur. John Siamas (Exhibit H) identified 219,673 unverified VBM requests… League of Women Voters v. Detzner, 172 So. 3d 363 (Fla. 2015), condemns election concealment, and Marks v. Stinson, 19 F.3d 873 (3d Cir. 1994), voids VBM fraud. These violations, with Judge Dubbeld's non-consent (¶18), evidence fraud. FVRS logs counties separately ("About Data Files Sent to FVRS"). Pinellas affidavits (Exhibit Q) confirm local fraud." ("Report: Absentee Status")

13. My investigation revealed Judge Jennifer Dubbeld, listed in Exhibit O, was unaware of her June 23, 2024, VBM request (Exhibit B). On October 22, 2024, then candidate for Judge Jennifer Dubbeld and I had a conversation reinforced my belief, based on Florida Department of State Division of Elections Vote by Mail Early Voting Reports and FVRS data (Exhibit B), 18 voter affidavits (Exhibit P), that unauthorized requests also targeted protected voters like Jennifer Dubbeld, creating bias requiring recusal (Rule 2.330(d)(1)).

14. Exhibit G confirms Judge Khouzam's active service on the Second DCA panel. Her name, and those of at least eight other judges on this court, appear in the vote-by-mail fraud data referenced by John Siamas (Exhibit H), indicating that the fraud is not isolated to a single individual but may compromise the structural neutrality of the entire reviewing tribunal. Rogers v. State, 630 So. 2d 513 (Fla. 1993), holds that cumulative bias creates structural error. The 219,673 unverified VBM requests, including Judges Khouzam and Dubbeld (Exhibit O), and assistants (Exhibit P), violate F.S. § 97.0585, compromising this tribunal's impartiality.

15. Based on cross-referenced data from the same public records referenced in Exhibit B, I have identified not only judges but also judicial assistants

assigned to chambers of the Second District Court of Appeal and the Sixth Judicial Circuit whose vote-by-mail ballots were fraudulently requested under similar circumstances. These unauthorized requests were also flagged as unverified (N status) and processed using blocked request paths. As judicial assistants are direct agents of their assigned judges, the inclusion of their voter records implicates those judges as potential material witnesses, further compromising their ability to serve impartially. This significantly expands the appearance of partiality across both trial and appellate benches and reinforces the existence of structural error that renders this tribunal constitutionally inadequate.

16. A detailed table of affected judges and judicial assistants is provided in Exhibit O, identifying 56 judicial officers and their assistants across the Second District Court of Appeal and Sixth Judicial Circuit with unverified vote-by-mail (VBM) requests on June 23, 2024, flagged as "N" (no verified ID) in the Florida Voter Registration System (FVRS) (Exhibit B). These include, but are not limited to, Judge Nelly N. Khouzam, Judge Morris Silberman, Judge Craig C Villanti, Judge Patricia Muscarella, Judge Thomas Ramsberger, Judge Judge Judge Jennifer Dubbeld, Chief Judge Shawn Crane's judicial assistant Louise Smith, Judge Edwin Jagger, Judge Lauralee G. Westine, Judge Kim Campbell, Judge Pamela A.M. Campbell, Judge

Sherwood Coleman, Judge Philip J Federico, Judge Evan Frayman, Judge Brian Gnage, Judge Mary M. Handsel, Judge Elizabeth Jack, Judge George Jirotka, Judge Doneene Loar, Judge Philippe Matthey, Judge Patrice Moore, Judge Cynthia J. Newton, Judge Nichole Pearlman, Judge Joshua Riba, Judge Pat Siracusa, Judge James R. Stearns, Judge Susan St. John, Judge Kimberly Todd, Judge Amy M. Williams, Judge John Carassas, Judge Diane Croff, Judge Robert Dittmer, Judge Holly Grissinger, Judge James Pierce, Judge John D Couriel, Judicial Assistant Debi McCarty, Judicial Assistant Stacy Wisman, Judicial Assistant Jill Psenisky, Judicial Assistant Bonnie Whitehall, Judicial Assistant Valerie McGivern, Judicial Assistant Melinda Vincent, Judicial Assistant Annie Nguyen, Judicial Assistant Jess Rayburn, Judicial Assistant Amber Demiduk, Judicial Assistant Veronica Jupiter, Judicial Assistant Lisa Schultz, Judicial Assistant Tracy Curley, Judicial Assistant Michelle Hall, Judicial Assistant JoAn Caffentzis, Judicial Assistant Vicki Masterson, Judicial Assistant Cheryl Nierengarten, Judicial Assistant Darleta Burris, Judicial Assistant Pamela Gariepy, Judicial Assistant Kim Haumann, all targeted in violation of F.S. § 97.0585, as protected voter profiles are blocked from online submissions (Exhibit I, "Dialog: Vote-By-Mail Request"). For example, Chief Judge Crane's assistant had an unverified request, implicating his chambers despite no

personal request, indicating a targeted scheme reaching judicial operations ("Report: Absentee Status for All Absentee Voters"). As judicial assistants are direct agents managing court functions, their compromised voter records create an appearance of bias for their judges, per Canon 3E(1)(a) of the Florida Code of Judicial Conduct. This pervasive fraud, affecting 56+ individuals across both trial and appellate benches, reinforces structural error rendering this tribunal constitutionally inadequate, as held in Rogers v. State, 630 So. 2d 513 (Fla. 1993), and Aetna Life Insurance Co. v. Lavoie, 475 U.S. 813 (1986) (¶19). The full scope, detailed in Exhibit O, mandates disqualification of Judge Khouzam and scrutiny of the entire tribunal to ensure due process. This table highlights the extent to which both trial and appellate court chambers are compromised, including instances where judges' assistants—but not the judges themselves—were targeted. Given their confidential role and direct connection to the judge's functioning, any such instance raises mandatory grounds for judicial disqualification under Canon 3E(1)(a). "For example, even in chambers where the judge's own record does not show a ballot request—such as Chief Circuit Shawn Crane—their judicial assistant's record was fraudulently accessed. This indicates a targeted scheme reaching into judicial chambers, rendering the judge a potential witness or person with direct knowledge of disputed facts."

Exhibit O lists numerous judicial assistants, assigned to numerous Judges, in the Sixth Circuit, with unverified VBM requests on June 23, 2024, flagged "N" in FVRS (Exhibit B). As direct agents managing judicial operations, their compromised voter records create an appearance of bias for their judges, per Canon 3E(1)(a), extending disqualification grounds to multiple Second DCA and Sixth Circuit panels.

17. The evidence shows that Judge Khouzam is both a material witness and a victim in the scheme central to this appeal. Under Rule 2.330(d)(1), disqualification is required when a judge has personal knowledge of disputed evidentiary facts. Canon 3E(1)(a) of the Florida Code of Judicial Conduct also mandates disqualification where a judge is likely to be a material witness.

18. The verified activity under Judge Khouzam's name and the appearance of her data in protected voter records, combined with the 'N' verification flags and administrative irregularities outlined in Exhibits C, I, and N, establish a well-grounded fear of judicial bias. Per Livingston v. State, 441 So. 2d 1083 (Fla. 1983), a reasonably prudent person would fear bias from Judge Khouzam, as her unauthorized VBM request (Exhibit B), confirmed by Judge Dubbeld's non-consent (¶18) and 18 voter affidavits (Exhibit P), violates F.S. § 97.0585, mandating disqualification.

19. The facts presented here would lead a reasonably prudent person to doubt Judge Khouzam's ability to remain impartial. Her continued participation in this appellate proceeding would violate my constitutional right to a fair and unbiased tribunal. The unauthorized VBM requests, including 219,673 on June 23, 2024, and withholding of audit logs, violates F.S. § 838.022 may violate F.S. § 104.061 (corrupt influence) and F.S. § 104.051 (election interference), constituting felonious acts that undermine judicial impartiality and public trust, further necessitating Judge Khouzam's recusal. Liljeberg v. Health Services Acquisition Corp., 486 U.S. 847 (1988), mandates disqualification under 28 U.S.C. § 455(a) when impartiality is questioned, as with Judge Khouzam's fraudulent VBM request (Exhibit B), corroborated by Judge Dubbeld (¶18) and 18 affidavits (Exhibit P), suggesting tribunal bias. Aetna Life Insurance Co. v. Lavoie, 475 U.S. 813 (1986), finds structural error when a judge has a personal stake, as with Judge Khouzam's and Judge Dubbeld's fraudulent VBM requests (Exhibit B), part of 219,673 violations (Exhibit P), tainting this tribunal. United States v. Microsoft Corp., 253 F.3d 34 (D.C. Cir. 2001), vacates rulings for apparent bias under 28 U.S.C. § 455(a). Judge Khouzam's and Judge Dubbeld's VBM fraud (Exhibit B), with 18 affidavits (Exhibit P), requires vacatur to protect due process. Caperton…

Williams… Liljeberg v. Health Services Acquisition Corp., 486 U.S. 847 (1988), and Aetna Life Insurance Co. v. Lavoie, 475 U.S. 813 (1986), mandate vacatur for bias… United States v. Microsoft Corp., 253 F.3d 34 (D.C. Cir. 2001), voids rulings for apparent bias affecting Judges Khouzam and Dubbeld (¶18).

20. My analysis of the State of Florida Division of Elections "Vote by Mail Early Voting Reports" and the VR Systems program documentation confirms that 219,673 vote by mail ballot requests made on Sunday, June 23, 2024, a date that the Supervisor of Elections was closed requires manipulation. As an election systems analyst I attest that 219,673 unverified requests require bots, automated or insider manipulation, violating F.S. § 104.061

21. The U.S. Supreme Court has made clear in *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009), and *Williams v. Pennsylvania*, 136 S. Ct. 1899 (2016), that judicial participation in cases where a judge is a material witness or has a personal stake constitutes a structural defect. These precedents apply directly here and demand disqualification as a matter of due process.

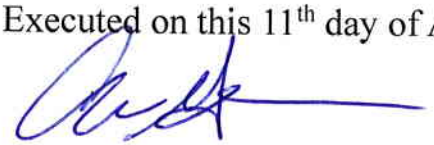
22. The information referenced in Exhibits E, F, I, and related VR Systems documentation was obtained directly from publicly accessible training and support materials hosted on the official VR Systems website

(https://www.vrsystems.com) and (https://content.vrsys.co/help/vf/Content/Voter_Registration/Dialog__Vote-by-Mail_Request.htm) or from publicly available sources previously published online. These documents were not obtained through confidential or privileged means and are available to election administrators, public records requestors, and researchers. Chastine v. Broome, 629 So. 2d 293 (Fla. 4th DCA 1993), requires vacatur if a biased judge rules. Judge Khouzam's fraudulent VBM request (Exhibit B), Judge Dubbeld's confirmation (¶18), and 219,673 violations (Exhibit P) mandate her disqualification to avoid voidable rulings.

23. I submit this affidavit in good faith and respectfully request that the Court consider these facts and disqualify Judge Nelly N. Khouzam from participation in this appeal. and respectfully request that the Court consider these facts and disqualify Judge Nelly N. Khouzam from participation in this appeal. I request Judge Khouzam's disqualification, a stay of proceedings under Rule 9.310 to compel FVRS log production, coordination with related cases per Rule 2.545, and an order under F.S. § 119.11 to access withheld logs, ensuring a fair tribunal and investigation of fraud affecting 219,673 VBM requests.

FURTHER AFFIANT SAYETH NAUGHT.

I declare under the penalty of perjury that the foregoing is true and correct.
Executed on this 11th day of April, 2025 at Largo, Florida.



/s/ Christopher Gleason

Christopher Gleason
2098 Seminole Boulevard, #6212
Largo, FL 33778
Phone 727-480-2059
Email: cpgleason72@gmail.com, gleason4pinellas@gmail.com

Sworn to and subscribed before me on this 11th day of April, 2025, by Christopher Gleason, who [X] is personally known to me or [ ] produced a Florida Driver's License as identification.

_____, No: _____).

/s/ _____
Notary Public
Name: _____
Commission No: _____
My Commission Expires: _____

CHRISTINE PETERS
Commission # HH 436653
Expires February 26, 2028

EXHIBIT B:

Excerpt Florida Department of State Vote By Mail Early Voting Reports

EXHIBIT B Excerpt of Florida Department of State, Division of Elections “Vote By Mail; Early Voting Report” For 09/03/2024

Covering August 2024 Primary – 06/23/2024 Illegal Vote By Mail Ballot Requests

Recor	Coun	VoterIdNumber	ElectionNi	ElectionDa	ElectionNa	LastRecorc	Vot	RequesteDate	Delivery Date	BallotRetu	Re	Mil	Ov	Mil	Prec	PrecinctSp	Congressi	SenateDis	HouseDist	CountyCo	SchoolBo	OtherDist	Party	Voter Name	M	MailingAd	MailingAd	MailingAddress	City	Mai	Mailing	Ma	E-mi	Fa	De	Voter	FLDL/	VoterSSN
VBM	PIN	106741060	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	BARTLETT, BRUCEL								BBAI			N	N	
VBM	PIN	106876672	43887	45524	2024 Prim	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	Y	N	Y										NPA	COLEMAN, SHERWOOD S											N	N	
VBM	PIN	107374929	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N										REP	CROFF, DIANE M											N	N	
VBM	PIN	111215604	43887	45524	2024 Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N										REP	DITTMER, ROBERT G								ROB			N	N	
VBM	PIN	107149377	43887	45524	2024 Prim	8/11/2024	P	6/23/2024	7/16/2024		N	N	N										REP	DUBBELD, JENNIFER C								DUB			N	N	
VBM	PIN	106986554	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										REP	FEDERICO, PHILIP J											N	N	
VBM	PIN	107285314	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	GNAGE, BRIAN E								bgna			N	N	
VBM	PIN	106995645	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	GRISSINGER, HOLLYT								griss			N	N	
VBM	PIN	107366706	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										NPA	JACK, ELIZABETH M											N	N	
VBM	PIN	103848463	43887	45524	2024 Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N										REP	JUPITER, VERONICA L								vero			N	N	
VBM	PIN	106993896	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										NPA	KELLY, LORRAINE M								LORI			N	N	
VBM	PIN	106723453	43887	45524	2024 Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N										REP	KHOUZAM, NELLYN											N	N	
VBM	PIN	106821566	43887	45524	2024 Prim	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N										REP	LENAS, JAMES S											N	N	
VBM	PIN	107338189	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	LOAR, DONEENE D								DON			N	N	
VBM	PIN	107285166	43887	45524	2024 Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N										DEM	LUCAS, CHERYLL								CHE			N	N	
VBM	PIN	107075643	43887	45524	2024 Prim	7/23/2024	V	6/23/2024	7/16/2024	7/23/2024	N	N	N										REP	MARCUS, JULIE K											N	N	
VBM	PIN	107150747	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N										NPA	MASTERSON, VICKIA								lmki			N	N	
VBM	PIN	107385240	43887	45524	2024 Prim	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N										REP	MATTHEY, PHILIPPE											N	N	
VBM	PIN	106958587	43887	45524	2024 Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N										DEM	MOORE, PATRICE W								pwm			N	N	
VBM	PIN	106784723	43887	45524	2024 Prim	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N										REP	MUSCARELLA, PATRICIA A								tmus			N	N	
VBM	PIN	107071107	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N										REP	NEWTON, CYNTHIA J											N	N	
VBM	PIN	100554220	43887	45524	2024 Prim	8/10/2024	P	6/23/2024	7/16/2024		N	N	N										REP	PEARLMAN, NICOLE M								NPE			N	N	
VBM	PIN	106815101	43887	45524	2024 Prim	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N										REP	PIERCE, JAMES V								jame			N	N	
VBM	PIN	107171797	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										DEM	RAMSBERGER, ANGELA M								ANG			N	N	
VBM	PIN	107143704	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N										NPA	RAMSBERGER, THOMAS M								TOM			N	N	
VBM	PIN	106991733	43887	45524	2024 Prim	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N										REP	RIBA, JOSHUA B								JRIB			N	N	
VBM	PIN	106869196	43887	45524	2024 Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N										NPA	SILBERMAN, MORRIS											N	N	
VBM	PIN	107328087	43887	45524	2024 Prim	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N										NPA	ST JOHN, SUSAN											N	N	
VBM	PIN	106750878	43887	45524	2024 Prim	6/25/2024	P	6/23/2024	7/16/2024		N	N	N										REP	STEARNS, JAMES R								aste			N	N	
VBM	PIN	106869683	43887	45524	2024 Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N										REP	TODD, KIMBERLY P								KIMI			N	N	
VBM	PIN	113787369	43887	45524	2024 Prim	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N										NPA	VILLANTI, CRAIG C								CCV			N	N	
VBM	PIN	106972664	43887	45524	2024 Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N										REP	WESTINE, LAURALEE G								lwes			N	N	
VBM	PIN	106715884	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										REP	WILLIAMS, AMY M											N	N	
VBM	PIN	107067204	43887	45524	2024 Prim	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	416	416	13	18	61	6	6	CCA,1	CT	REP	MCCARTY, DEBRAL	10			TAMPA	FL	33612					N	N	
VBM	PIN	106817396	43887	45524	2024 Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	421	421	13	18	58	5	5	CCA,2	CT	REP	JIROTKA, GEORGEM	11			BELLEAIR SHORE	FL	33786					N	N	
VBM	PIN	125032393	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	516	516	13	21	58	5	5	CCA,2	CT	DEM	SMITH, LOUISEP	12			CLEARWATER	FL	33755					N	N	
VBM	PIN	107388567	43887	45524	2024 Prim	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	518	518.1	13	21	58	5	5	CCA,2	CT	DEM	GUALTIERI, GALAS	13			CLEARWATER	FL	33755					N	N	
VBM	PIN	123861050	43887	45524	2024 Prim	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	606	606.1	13	21	57	4	4	CCA,1	CT	REP	HALL, MICHELLE B	13			SAFETY HARBOR	FL	34695					N	N	
VBM	PIN	107377969	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	517	517.1	13	21	58	5	5	CCA,2	CT	NPA	HAUMANN, KIMM	14			CLEARWATER	FL	33755	KIMI				N	N	
VBM	PIN	120581459	43887	45524	2024 Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	539	539	13	21	57	4	4	CCA,2	FC	DEM	SCHULTZ, LISAM	18			PALM HARBOR	FL	34683	LISA				N	N	
VBM	PIN	106772419	43887	45524	2024 Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	632	632	13	21	57	4	4	CCA,1	FC	REP	SIRACUSA, PAT	18			PALM HARBOR	FL	34684	PATS				N	N	
VBM	PIN	106862612	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	530	530	13	21	57	4	4	CCA,2	CT	REP	DESANTIS, KARENA	18			DUNEDIN	FL	34698	kdes				N	N	
VBM	PIN	106862613	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	530	530	13	21	57	4	4	CCA,2	CT	REP	DESANTIS, RONALDD	18			DUNEDIN	FL	34698	DES/				N	N	
VBM	PIN	107203935	43887	45524	2024 Prim	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	420	420.1	13	18	58	5	5	CCA,2	CT	NPA	FRAYMAN, EVAN G	20			INDIAN ROCKS BEACH	FL	33785	efray				N	N	
VBM	PIN	106926631	43887	45524	2024 Prim	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	622	622	13	21	57	4	4	CCA,1	CT	NPA	CAFFENTZIS, JOAN	20			OLDSMAR	FL	34677	joma				N	N	
VBM	PIN	113659838	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	155	155.1	14	18	60	6	6	CCA,3	CT	REP	RAYBURN, JESSICAD	30			ST PETERSBURG	FL	33702	jessi				N	N	
VBM	PIN	107033915	43887	45524	2024 Prim	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	625	625	13	21	57	4	4	CCA,1	FC	DEM	DEMIDUK, AMBER D	31			PALM HARBOR	FL	34684-4	ADEI				N	N	
VBM	PIN	124912657	43887	45524	2024 Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	623	623.1	13	21	58	4	4	CCA,1	CT	REP	WHITEHALL, BONNIEM	31			CLEARWATER	FL	33761					N	N	
VBM	PIN	106873482	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	636	636	13	21	57	4	4	CCA,1	FC	REP	VINCENT, MELINDAL	31			PALM HARBOR	FL	34685	VINC				N	N	
VBM	PIN	107033524	43887	45524	2024 Prim	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	627	627.1	13	21	57	4	4	CCA,1	FC	REP	NIERENGARTEN, CHERYL D	43			OLDSMAR	FL	34677	CNIE				N	N	
VBM	PIN	106981943	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	244	244	13	18	61	7	7	CCA,1	CT	REP	MCGIVERN, VALERIE B	48			KENNETH CITY	FL	33709	kishl				N	N	
VBM	PIN	106978328	43887	45524	2024 Prim	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	216	216	13	18	61	7	7	CCA,3	CT	NPA	PSENISKY, JILLS	55			ST PETERSBURG	FL	33707	Jill.P				N	N	
VBM	PIN	106859620	43887	45524	2024 Prim	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	244	244.1	13	18	61	7	7	CCA,1	FC	REP	BURRIS, DARLETAJ	56			ST PETERSBURG	FL	33709	DJB1				N	N	
VBM	PIN	107379308	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	232	232	13	18	61	7	7	CCA,3	CT	DEM	NGUYEN, ANNP	56			ST PETERSBURG	FL	33710	annp				N	N	
VBM	PIN	106878898	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	230	230	13	18	61	7	7	CCA,3	CT	DEM	CURLEY, TRACYD	63			ST PETERSBURG	FL	33710					N	N	
VBM	PIN	107118442	43887	45524	2024 Prim	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	712	712.1	13	21	57	4	4	CCA,2	CT	REP	WISMAN, STACYL	84			TARPON SPRINGS	FL	34689	stac				N	N	

EXHIBIT B: Excerpt of Florida Department of State, Division of Elections "Vote By Mail; Early Voting Report" For 11/09/2024

County	VoterIdNum	ElectionNu	ElectionDa	ElectionNa	LastRecord(	Voti	RequestedI	Delivery Dat	BallotReturn	Req	Mili	Ov	Mil	Preci	Precin	Con	Sen	Hou	Con	Sc	OtherDistr	Party	Voter Name	Mail	Ma	Mai	MailingAd	MailingAd	MailingAd	E-ma	Faxn	Des	Des	Voter	FLDL/	VoterSSN4
PIN	106741060	43888	11/5/2024	2024 Gene	10/29/2024	V	9/9/2024	10/1/2024	10/29/2024	N	N	N										REP	BARTLETT, BRUCEL							BBAF				N	N
PIN	107167732	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	CAMPBELL, KIMBERLY A							KIMC				N	N
PIN	106758700	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	CAMPBELL, PAMELA AM											N	N
PIN	107149377	43888	11/5/2024	2024 Gene	10/30/2024	P	9/9/2024	10/1/2024		N	N	N										REP	DUBBELD, JENNIFER C							DUBI				N	N
PIN	107125137	43888	11/5/2024	2024 Gene	11/5/2024	V	9/9/2024	10/1/2024	11/5/2024	N	N	N										REP	FESTA, NOELLE E											N	N
PIN	110785320	43888	11/5/2024	2024 Gene	9/11/2024	P	9/9/2024	10/1/2024		N	N	N										REP	GIBSON, KATHLEEN E							kathi				N	N
PIN	117216165	43888	11/5/2024	2024 Gene	11/2/2024	V	9/9/2024	10/1/2024	11/2/2024	N	N	N										NPA	GRIMES, WENDY L							wgrir				N	N
PIN	106808845	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										NPA	HILL, KAREN D							KIKID				N	N
PIN	107366706	43888	11/5/2024	2024 Gene	10/22/2024	P	9/9/2024	10/1/2024		N	N	N										NPA	JACK, ELIZABETH M											N	N
PIN	130471287	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N										REP	JAGGER, BLAKE B							BJAC				N	N
PIN	106832762	43888	11/5/2024	2024 Gene	11/2/2024	V	9/9/2024	10/1/2024	11/2/2024	N	N	N										REP	JAGGER, EDWIN B							EJAG				N	N
PIN	111191787	43888	11/5/2024	2024 Gene	10/24/2024	V	9/9/2024	10/1/2024	10/24/2024	N	N	N										REP	KAHN, JARED D							jared				N	N
PIN	107015570	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	KERR, CHRISTOPHIR A							CHRI				N	N
PIN	107018866	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	KERR, LISA M							KERF				N	N
PIN	106723453	43888	11/5/2024	2024 Gene	11/1/2024	P	9/9/2024	10/1/2024		N	N	N										REP	KHOUZAM, NELLY N											N	N
PIN	107203473	43888	11/5/2024	2024 Gene	11/3/2024	V	9/9/2024	10/1/2024	11/3/2024	N	N	N										REP	KOSKINAS, THOMAS D							TOMI				N	N
PIN	107338188	43888	11/5/2024	2024 Gene	10/15/2024	V	9/9/2024	10/1/2024	10/15/2024	N	N	N										REP	LOAR, DONEENED							DON				N	N
PIN	107075643	43888	11/5/2024	2024 Gene	10/21/2024	V	9/9/2024	10/1/2024	10/21/2024	N	N	N										REP	MARCUS, JULIE K											N	N
PIN	107385240	43888	11/5/2024	2024 Gene	10/13/2024	V	9/9/2024	10/1/2024	10/13/2024	N	N	N										REP	MATTHEY, PHILIPPE											N	N
PIN	106958587	43888	11/5/2024	2024 Gene	10/23/2024	V	9/9/2024	10/1/2024	10/23/2024	N	N	N										DEM	MOORE, PATRICEW							pwm				N	N
PIN	106784723	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	MUSCARELLA, PATRICIA A							tmus				N	N
PIN	107071107	43888	11/5/2024	2024 Gene	11/5/2024	V	9/9/2024	10/1/2024	11/5/2024	N	N	N										REP	NEWTON, CYNTHIA J											N	N
PIN	100554220	43888	11/5/2024	2024 Gene	10/7/2024	V	9/9/2024	10/1/2024	10/7/2024	N	N	N										REP	PEARLMAN, NICOLE M							NPEA				N	N
PIN	106894052	43888	11/5/2024	2024 Gene	11/1/2024	P	9/9/2024	10/1/2024		N	N	N										REP	PETERS, KATHLEEN M							Kathl				N	N
PIN	107171787	43888	11/5/2024	2024 Gene	11/5/2024	V	9/9/2024	10/1/2024	11/5/2024	N	N	N										DEM	RAMSBERGER, ANGELA M							ANG				N	N
PIN	107143704	43888	11/5/2024	2024 Gene	10/25/2024	V	9/9/2024	10/1/2024	10/25/2024	N	N	N										NPA	RAMSBERGER, THOMAS M							TOMI				N	N
PIN	106991733	43888	11/5/2024	2024 Gene	10/18/2024	V	9/9/2024	10/1/2024	10/18/2024	N	N	N										REP	RIBA, JOSHUA B							JRIBA				N	N
PIN	100307077	43888	11/5/2024	2024 Gene	10/7/2024	V	9/9/2024	10/1/2024	10/7/2024	N	N	N										REP	ROSS, ADAM M											N	N
PIN	106869196	43888	11/5/2024	2024 Gene	11/1/2024	P	9/9/2024	10/1/2024		N	N	N										NPA	SILBERMAN, MORRIS											N	N
PIN	107328057	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N										NPA	ST JOHN, SUSAN											N	N
PIN	106750378	43888	11/5/2024	2024 Gene	10/30/2024	V	9/9/2024	10/1/2024	10/30/2024	N	N	N										REP	STEARNS, JAMES R							astea				N	N
PIN	117723880	43888	11/5/2024	2024 Gene	10/21/2024	V	9/9/2024	10/1/2024	10/21/2024	N	N	N										REP	SULLIVAN, COURTNEY A							COU				N	N
PIN	106869683	43888	11/5/2024	2024 Gene	10/25/2024	V	9/9/2024	10/1/2024	10/25/2024	N	N	N										REP	TODD, KIMBERLY P							KIMP				N	N
PIN	113787368	43888	11/5/2024	2024 Gene	10/24/2024	V	9/9/2024	10/1/2024	10/24/2024	N	N	N										NPA	VILLANTI, CRAIG C							CCVI				N	N
PIN	106572664	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	WESTINE, LAURALEE G							lwest				N	N
PIN	106715884	43888	11/5/2024	2024 Gene	10/23/2024	V	9/9/2024	10/1/2024	10/23/2024	N	N	N										REP	WILLIAMS, AMY M											N	N
PIN	112888181	43888	11/5/2024	2024 Gene	10/27/2024	V	9/9/2024	10/1/2024	10/27/2024	N	N	N										NPA	ARROJO GNAGE, ANN KRISTEN I							karro				N	N
PIN	106835464	43888	11/5/2024	2024 Gene	10/23/2024	V	9/9/2024	10/1/2024	10/23/2024	N	N	N										REP	CARASSAS, JOHN							CARA				N	N
PIN	106876672	43888	11/5/2024	2024 Gene	10/23/2024	P	9/9/2024	10/1/2024		Y	N	Y										NPA	COLEMAN, SHERWOOD S											N	N
PIN	107374928	43888	11/5/2024	2024 Gene	10/31/2024	V	9/9/2024	10/1/2024	10/31/2024	N	N	N										REP	CROFF, DIANE M											N	N
PIN	106586554	43888	11/5/2024	2024 Gene	10/15/2024	V	9/9/2024	10/1/2024	10/15/2024	N	N	N										REP	FEDERICO, PHILIP J											N	N
PIN	121758410	43888	11/5/2024	2024 Gene	11/2/2024	V	9/9/2024	10/1/2024	11/2/2024	N	N	N										DEM	SILBERMAN, GABRIELLE C							GABI				N	N
PIN	115152501	43888	11/5/2024	2024 Gene	10/25/2024	V	9/9/2024	10/1/2024	10/25/2024	N	N	N	627	627	13	21	57	4	4	CCA,1 | FC	REP	ZUROWESTE, MARKS	105		OLI	FL	34677		z.din				N	N
PIN	106817356	43888	11/5/2024	2024 Gene	10/22/2024	V	9/9/2024	10/1/2024	10/22/2024	N	N	N	421	421	13	18	58	5	5	CCA,2 | CT	REP	JIROTKA, GEORGE M	112		BEL	FL	33786						N	N
PIN	125032393	43888	11/5/2024	2024 Gene	11/2/2024	V	9/9/2024	10/1/2024	11/2/2024	N	N	N	516	516	13	21	58	5	5	CCA,2 | CT	DEM	SMITH, LOUISE P	121		CLE	FL	33755						N	N
PIN	106815658	43888	11/5/2024	2024 Gene	10/26/2024	V	9/9/2024	10/1/2024	10/26/2024	N	N	N	516	516	13	21	58	5	5	CCA,2 | CT	DEM	BATTLE, MARLENA J	172		CLE	FL	33755						N	N
PIN	106772418	43888	11/5/2024	2024 Gene	10/18/2024	V	9/9/2024	10/1/2024	10/18/2024	N	N	N	632	632	13	21	57	4	4	CCA,1 | FC	REP	SIRACUSA, PAT	180		PAL	FL	34684		PATS				N	N
PIN	118836062	43888	11/5/2024	2024 Gene	10/30/2024	V	9/9/2024	10/1/2024	10/30/2024	N	N	N	622	622	13	21	57	4	4	CCA,1 | CT	DEM	VONDERHEIDE, EMILY A	181		OLI	FL	34677		emily				N	N
PIN	106862612	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N	530	530	13	21	57	4	4	CCA,2 | CT	REP	DESANTIS, KAREN A	183		DUI	FL	34698		kales				N	N
PIN	106862613	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N	530	530	13	21	57	4	4	CCA,2 | CT	REP	DESANTIS, RONALD D	183		DUI	FL	34698		DESA				N	N
PIN	106814594	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N	543	543	13	21	57	4	4	CCA,2 | FC	REP	HANDSEL, MARY M	188		PAL	FL	34683		mhar				N	N
PIN	107203835	43888	11/5/2024	2024 Gene	10/25/2024	V	9/9/2024	10/1/2024	10/25/2024	N	N	N	420	420	13	18	58	5	5	CCA,2 | CT	NPA	FRAYMAN, EVANG	200		IND	FL	33785		efray				N	N
PIN	106873787	43888	11/5/2024	2024 Gene	10/7/2024	V	9/9/2024	10/1/2024	10/7/2024	N	N	N	511	511	13	21	58	5	5	CCA,2 | CT	REP	STANLEY, BRYAN J	205		CLE	FL	33756		BRYA				N	N
PIN	107176725	43888	11/5/2024	2024 Gene	10/26/2024	V	9/9/2024	10/1/2024	10/26/2024	N	N	N	420	420	13	18	58	5	5	CCA,2 | CT	REP	SCHOLL, MARY J	220		IND	FL	33785						N	N
PIN	113659838	43888	11/5/2024	2024 Gene	11/4/2024	V	9/9/2024	10/1/2024	11/4/2024	N	N	N	155	155	14	18	60	6	6	CCA,3 | CT	REP	RAYBURN, JESSICAD	301		STI	FL	33702		jessi				N	N
PIN	123610805	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N	241	241	13	18	61	7	7	CCA,3 | CT	DEM	SERCUS, ELIZABETH A	310		STI	FL	33710		beth				N	N
PIN	124512657	43888	11/5/2024	2024 Gene	10/21/2024	V	9/9/2024	10/1/2024	10/21/2024	N	N	N	623	623	13	21	58	4	4	CCA,1 | CT	REP	WHITEHALL, BONNIEM	316		CLE	FL	33761						N	N
PIN	106873482	43888	11/5/2024	2024 Gene	10/21/2024	V	9/9/2024	10/1/2024	10/21/2024	N	N	N	636	636	13	21	57	4	4	CCA,1 | FC	REP	VINCENT, MELINDAL	319		PAL	FL	34685		VINC				N	N
PIN	107071730	43888	11/5/2024	2024 Gene	10/22/2024	V	9/9/2024	10/1/2024	10/22/2024	N	N	N	621	621	13	21	57	4	4	CCA,1 | CT	REP	CHRISTISON, TERESA J	384		OLI	FL	34677		TCHR				N	N
PIN	106881843	43888	11/5/2024	2024 Gene	11/3/2024	V	9/9/2024	10/1/2024	11/3/2024	N	N	N	244	244	13	18	61	7	7	CCA,1 | CT	REP	MCGIVERN, VALERIE B	485		KEN	FL	33705		kishk				N	N
PIN	125746368	43888	11/5/2024	2024 Gene	10/26/2024	V	9/9/2024	10/1/2024	10/26/2024	N	N	N	627	627	13	21	57	4	4	CCA,1 | FC	DEM	GALLATY, CONAN A	497		OLI	FL	34677		cgall				N	N
PIN	125836313	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N	627	627	13	21	57	4	4	CCA,1 | FC	DEM	GALLATY, NATASHAR	497		OLI	FL	34677		nrgal				N	N
PIN	107379308	43888	11/5/2024	2024 Gene	10/26/2024	V	9/9/2024	10/1/2024	10/26/2024	N	N	N	232	232	13	18	61	7	7	CCA,3 | CT	DEM	NGUYEN, ANN P	567		STI	FL	33710		annp				N	N
PIN	107001354	43888	11/5/2024	2024 Gene	10/24/2024	V	9/9/2024	10/1/2024	10/24/2024	N	N	N	144	144	14	18	60	6	6	CCA,3 | CT	REP	SCHORSCH, PETER D	573		STI	FL	33703		Saint				N	N
PIN	111125724	43888	11/5/2024	2024 Gene	10/31/2024	P	9/9/2024	10/1/2024		N	N	N	144	144	14	18	60	6	6	CCA,3 | CT	DEM	TODD SCHORSCH, ROBIN M	573		STI	FL	33703		rmicl				N	N
PIN	106735562	43888	11/5/2024	2024 Gene	10/15/2024	V	9/9/2024	10/1/2024	10/15/2024	N	N	N	222	222	13	18	61	7	7	CCA,3 | CT	DEM	POLSON, HERBERT E	614		STI	FL	33710		herbj				N	N
PIN	106739520	43888	11/5/2024	2024 Gene	10/15/2024	V	9/9/2024	10/1/2024	10/15/2024	N	N	N	222	222	13	18	61	7	7	CCA,3 | CT	DEM	POLSON, MARILYN M	614		STI	FL	33710		maril				N	N
PIN	107118442	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N	712	712	13	21	57	4	4	CCA,2 | CT	REP	WISMAN, STACY L	845		TAF	FL	34689		stacy				N	N
PIN	106730927	43888	11/5/2024	2024 Gene	10/29/2024	V	9/9/2024	10/1/2024	10/29/2024	N	N	N	254	254	13	18	61	6	6	CCA,1 | CT	NPA	HELINGER, JOHN J	890		SEN	FL	33777		jackh				N	N
PIN	106734148	43888	11/5/2024	2024 Gene	10/31/2024	V	9/9/2024	10/1/2024	10/31/2024	N	N	N	135	135	14	16	60	7	7	CCA,3 | CT	DEM	WILLIAMS, EMILY B	939		STI	FL	33701						N	N

EXHIBIT C:

Pinellas County Supervisors of Elections Office Hours

votepinellas.gov

Deadline to register to vote and/or change party affiliation: February 10, 2025

Deadline to request a ballot be mailed to you: February 27, 2025, at 5:00 p.m.

TRACK MY MAIL BALLOT

FIND MY POLLINGPLACE

Early Voting: Not conducted for municipal elections

Secure Mail Ballot Return Locations: One of our three offices

Election Day: March 11, 2025

Polls Open: 7:00 a.m. – 7:00 p.m.

Get Election Ready!

Request Sample Ballot

NEWS

HURRICANE RESPONSE

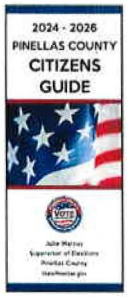
HURRICANE RESPONSE PAGE

For information on our hurricane response and election updates, visit our dedicated hurricane response page.

DATES TO REMEMBER

MARCH 11, 2025

MUNICIPAL ELECTIONS
Registration Deadline: February 10, 2025
Mail Ballot Request Deadline: February 27, 2025



DOWNLOAD THE PINELLAS COUNTY VOT CITIZENS GUIDE

The Voter Handbook includes an overview of voting i dates for upcoming elections, information on updatin information, how to request a mail ballot, what to ex or on Election Day and frequently asked questions. Th names and contact information of Pinellas County off

View 2024-25 Voter Handbook here
Vea el Manual de Votantes 2024-25 aquí

View the 2024-26 Citizens Guide here
Vea la Guía Para Ciudadanos 2024-26 aquí

The Florida Division of Elections also publishes a vote

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email:** Election@VotePinellas.gov | Public Records Request Form

P:(727) 464-VOTE (8683) • F:(727) 464-6239

Election Service Center
13001 Starkey Rd.
Largo, FL 33773
(Starkey Lakes Corporate Center)

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

County Building
501 First Avenue North
St. Petersburg, FL 33701
(Fifth Street North Entrance

F.S. 668.6076 Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. To submit a public re

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email:** Election@VotePinellas.gov | Public Records Request Form

P:(727) 464-VOTE (8683) • F:(727) 464-6239

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

ot want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by

June 2024

Add Holidays | More...

Save
sign in

Print

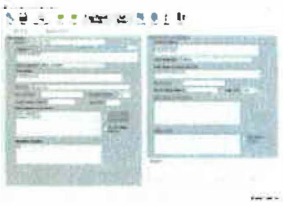
Sun	Mon	Tue	Wed	Thu	Fri	Sat
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

EXHIBIT D:

VR Systems: "Dialog: Process Web Vote-By-Mail Requests" (Protected Voter Display)

Process Web Vote-By-Mail Requests

To access: **Vote By Mail > Process Web Requests > {*request*}**



From this dialog, you can process a Vote-By-Mail Request submitted on your website into the voter's record. The election's status must be Active or Return Processing Only to process Vote-By-Mail Requests submitted on the web.

> **Note:** Once a Web Request has been processed (either by pressing **Save** or **Save and Print**), a row recording this activity will appear on the Comms tab of the affected voter's Voter Maintenance record. The Web Absentee Request communication will reflect the date the request was submitted, not the date it was processed.

If the voter has already voted—either by voting early, by in-office absentee, or by returning a mail ballot—you will see a message to that effect when you access the request. At that point you can either reject the request or process it manually. Either way removes it from the queue. No record of the rejection or decision to manually process the request is made on the voter's **Audit** tab.

If the election's status is not one of these, you will see a message to that effect and you should reject the request.

When you access a request, if you see messages indicating:

- the election's status is not Active or Return Processing Only

or

- the voter's precinct is not voting in the election

you should reject the request. No record will be made in the voter's record.

If the voter making the request is a Protected Voter, the program will hide the residence, mailing, and ballot addresses by displaying ****Protected****.

Toolbar

Save	Processes the request into the voter's record where it will appear on theirVote-By-Mail tab.

Process Manually	Removes the request from the queue. You have the option of printing a copy of the request to assist with manual processing. No record of the rejection is made on the voter's **Audit** tab.
Reject Request	Deny the request and remove the request from the queue. No record of the rejection is made on the voter's **Audit** tab.
Voters	Opens the voter's registration record.

Web Request

Election	*Display only field.* Shows *All Elections* or the name of the single election for which the voter requested a ballot.
Submitted Date	*Display only field.* The time and date when the request was submitted on the county website.
Residence	The residential address entered by the voter on the request form. It is informational only and is not copied to the voter's record.
Voter Classification	*Display only field.* Derived from the voter classification that the voter selects on the online form. This information will be copied to the voter's record. So for example, if a voter is not currently designated as Overseas or Military and they claim this classification on the online form (and provide a supporting overseas address if required for the classification they are claiming), the Overseas or Military flag will be set in their voter registration record when the Vote-By-Mail Request is processed.
Email Address	*Display only field.* If the voter provided an email address with their request, this field is copied to the Vote-By-Mail tab of the voter's record, overwriting any email address already there.
Signature	*Display only field.* The signature text entered by the person who submitted the request.

Phone Number	*Display only field.* The phone number, if the voter supplied one on their request. It is provided here for situations when you need to contact the voter about their request. This phone number is saved to the **View Web Absentee Request** dialog in the voter's record (not the **Telephone** field on the **Maint** tab). To access the **View Web Absentee Request** dialog, go to the **Comms** tab and double-click the entry marked **Web Absentee Request**.
Requested Delivery	*Display only field.* This field will display the voter's requested delivery method—**Mail**, **Email**, **Fax**, or **AcOnline**.
Driver's License/State ID	The voter's driver's license or state ID number, if entered on the request form.
Last 4 SSN	The last four digits of the voter's Social Security Number, if entered on the request form.
Ballot Address for this Election *Displayed if voter requested ballot for one election only.* **Ballot Address for All Elections** *Displayed if voter requested ballots for all elections.*	On the online Absentee/Mail Ballot Request form, the voter selected the option **I wish to receive my ballot(s) at the address designated below** and provided an address in the fields provided when this option is selected. Unless you select one of the two check boxes, processing the request will copy the address to the Vote-By-Mail Addresses dialog in the voter's record: For single election requests, the address is copied to the **Ballot Addressfor this Election** fields. For all-elections requests, the address is copied to the **Default Ballot Address** fields. If you want to modify this address, click in the box to open a dialog for editing.

Same as Mailing Address (Do not update address)	This check box is selected automatically when the mailing address on the request is identical to the mailing address in the voter's record. It prevents the processing program from updating the voter's mailing address with the ballot address entered on the web form. You would manually select this check box if you think the mailing address on record is more accurate than the one the voter submitted—for example, if the address in the request has spelling errors. When this check box is not selected, saving the request saves the address in this field to the **Ballot Address for This Election** (if the request is for a single election) or the **Default Ballot Address** (if an all-elections request) in the voter's record.
Move to Mailing Address	Select to have the address provided by the voter copied to the mailing address in the voter's record.
Requester Information	Indicates whether the request was made by the voter (Self) or another person who is a family member or legal guardian of the voter (Requester). For a *Requester* (person other than the voter), the information that displays is the requester's name, address, relationship to voter, and when provided in the MBRS request, the last four digits of the requester's Social Security Number or driver license/state ID number. To modify the requester information, click in the box to open a dialog for editing. You can also view and edit the requester information from the Vote-By-Mail tab > Mail-Ballot Adjustments > Maintain Requester Information dialog in the voter's record.

UOCAVA Address Provided by Voter	If the voter requested a delivery method other than mail, this address was required on the web request to validate that the voter has UOCAVA status. Any address displayed here will be discarded when you save the request unless you select the **Move to Mailing Address** field next to the UOCAVA address, which will overwrite the mailing address on the voter's record. If you want to modify this address, click in the box to open a dialog for editing.
Move to Mailing Address	Copies the address in the **UOCAVA Address Provided by Voter** field to the voter's mailing address.

Information from the Voter's Existing Record

Voter's Residence Address	*Display only field.* The residential address in the voter's record. If the voter provided a different residential address on the web request, it will not be copied to the voter registration record.
Voter Classification	*Display only field.* Derived from the **Military**and **Mil Dep** fields in the voter's record.
Email Address (on Vote-By-Mail Tab)	*Display only field.* If the voter provided an email address on a previous request and it is present on theVote-By-Mailtab of their record, it will be shown here. If they provided an email address on the current web request, it will be copied to the **Email** field on their **Vote-By-Mail** tab, overwriting any email address already there.
Phone Number	*Display only field.* The phone number from the voter's record. If the voter entered a phone number on the web request, it is not copied to their record.

Driver's License/State ID	The voter's driver's license or state ID number, if entered in the voter's record.
Last 4 SSN	The last four digits of the voter's Social Security Number, if entered in the voter's record.
Ballot Address for This Election *(single election requests)* **or** **Default Ballot Address** *(all-elections requests)*	*Display only field.* If the voter already has a request for this election, this field displays the ballot address for this election, if one exists on the Vote-By-Mail Addresses dialog in their record. If the voter has a default ballot address on the **Vote-By-Mail Addresses** dialog, it will be displayed here.
Mailing Address	*Display only field.* If the voter has a mailing address, it will be displayed here.
Clear Mailing Address	Select if you want to remove the existing mailing address from the voter's record when you click **Save** to process the request.
Remarks	If the voter already has a request for the election or they are ineligible, the system will note it here. You can edit this field with additional comments, if you like. The contents of this field are saved to the **Remarks** field on the **View Web Absentee Request** dialog in the voter's record. To access this dialog, go to the **Comms** tab and double-click the entry marked **Web Absentee Request**.

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EXHIBIT E:

VR Systems: "About Data Files Sent to FVRS by Voter Focus")

Data Files Sent to FVRS by Voter Focus

This topic describes the files Voter Focus automatically sends to the State system. Files are automatically sent by Voter Focus which runs automatically after midnight every day and for every two hours thereafter.

Daily Election Files

Counties are required to prepare and transmit to the State three files pertaining to voting by mail and early voting in an election. The Absentee Ballot Request Information file must be sent daily beginning 70 days before an election and for 15 days after the election. The two early voting files (Early Voting Summary and Early Voting Voters List) are sent each day beginning the first day of early voting and for three days after the end of early voting.

Each daily election file is a complete report of voting in the election so far; they overwrite the daily files sent previously.

The three files are transmitted automatically by the Voter Focus program Send Public Files, which runs automatically after midnight every day and for every two hours thereafter. If one or more of these files have not been sent to the State by 8 am during the reporting period, you will see a Send Public Files alert in VR Dashboard (and will receive an email if Alerts Maintenance is set up to send emails for the Send Public Files alert).

- **Vote-By-Mail Ballot Request Information File**—Lists county voters who have requested a mail ballot for an election, the status of the request, and other relevant data. Protected voters will be included in these files, with sensitive information such as address, precinct, and district redacted.

  Note: In the Candidate File Distribution portal, this file is known as the County Mail Ballot Status File.

  This file is automatically created and sent to FVRS daily (overnight) beginning 70 days prior to an election and ending on the 15th day after the election. If a general election is preceded by a primary, a separate file is sent for each election.

  The file contains information processed up to close of business on the day prior to the overnight run. Each daily file contains all Vote-By-Mail voters to date, not just new additions. It can contain Vote-By-Mail data for multiple elections. A copy of each file sent to the state is placed in \Vr6Sharedbinaries\FVRSUpload. The file name is *<county code>_VBM_<FVRS election number>_<date of run>_<time of run>*.

  Contents of the file, reading left to right:

Header	Description	Format
RecordType	Vote-by-Mail ballot request status	VBM
CountyID	County providing summary	Char (3) — FVRS code
Voter IdNumber	Voter ID number	Numeric (10)
ElectionNumber	Election identifier	Numeric (10)
ElectionDate	Date of the election	MM/DD/YYYY
ElectionName	Name of election	Char (35)
LastRecordChangeDate	Date the vote-by-mail summary record was last updated	MM/DD/YYYY
VoteByMail	C—Canceled by the voter or the voter moved out of county before the ballot was provided to voter E—Voter error or eligibility issue L—Returned untimely N—Unsigned (no signature provided on certificate or affidavit) P—Provided by any proper means of delivery R—Requested (this election) S—Standing (all elections) U—Returned undeliverable V—Returned and voted timely X—Mismatched signature on the certificate or affidavit	Char (1)
RequestDate		MM/DD/YYYY

Header	Description	Format
DeliveryDate		MM/DD/YYYY
BallotReturnDate	Overseas ballots received during the 10-day period after Election Day for a presidential preference primary or general election shall be recorded with a return day of Election Day if the ballot counted.	MM/DD/YYYY
RequestCanceledDate		MM/DD/YYYY
Military		Char (1) Y, N
OverseasFlag		Char (1) Y, N
MilitaryDependent		Char (1) Y, N
Precinct		Char (6)
PrecinctSplit		Char (10)
CongressionalDistrict		Numeric (2)
SenateDistrict		Numeric (2)
HouseDistrict		Numeric (3)
CountyCommissionDistrict		Char (10)
SchoolBoardDistrict		Char (10)
OtherDistricts		Char (25)
Party		Char (3)
VoterName		Char (99)
MailingAddressLine1		Char (40)
MailingAddressLine2		Char (40)
MailingAddressLine3		Char (40)
MailingAddressCity		Char (40)
MailingAddressState		Char (2)
MailingAddressZip		Char (15)
MailingAddressCountry		Char (40)
EmailAddress		Char (100)
FaxNumber		Char (20)
DesigneeNameRequest	Designee, who can only be voter's immediate family or legal guardian, making request on behalf of voter	Char (99)
DesigneeNamePickup	Designee, who may be someone other than immediate family, picking up ballot for voter	Char (99)
Voter FLDL/StateID	Y = information was provided; N = information was not provided **Note**: This value can come from MBRS or the ID type selection on the Vote By Mail Request or Maintain Requester Information dialog.	Char (1)
VoterSSN4	Y = information was provided; N = information was not provided **Note**: This value can come from MBRS or the ID type selection on the Vote By Mail Request or Maintain Requester Information dialog.	Char (1)

Note: The absentee request status S denotes voters who have a standing request, while R denotes voters who requested a ballot for this election only. When Vote-By-Mail requests are generated for all elections voters, all S voters who are eligible to vote in the election will subsequently appear twice in the Vote-By-Mail Ballot Request Information File: once with the S status and again with the R status. Any all-elections/FPCA voters who are not

eligible to vote in the election with only be listed once—with the S status. Those voters will not be listed again with an R status, since they will not receive a ballot.

Note: In order for the requests status *N—No signature* to be reported in the Vote-By-Mail Ballot Request Information File for no signature referrals, the option **"No Signature" Reason** must be selected in System Codes **> Vote-By-Mail Referral Reasons** for every no signature referral reason.

- **Early Voting Voters List**—Lists county voters who have early voted in an election to date. This file is automatically created and sent to FVRS daily beginning the first day of early voting and for three days after the end of early voting. If multiple elections have early voting in progress on a given day, a separate file for each election is sent to FVRS. A copy of each file sent to the state is placed in \Vr6Sharedbinaries\FVRSUpload. The file name is *<county ID>*_EVL_*<FVRS election number>*_*<date of run>*_*<time of run>*.

  Contents of the file, reading left to right:

County ID	FVRS Election number	Election date
Election name	Voter registration ID	Voter name
Precinct	Party	Voter's early voting location
Date voter early voted		

Voting History File

EViD Get Out the Vote Report

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EXHIBIT F:

VR Systems: "How to Process Received Mail Ballot Requests"

Process Mail Ballot Requests Received

Vote-by-mail requests submitted via the Mail Ballot Request Service are sent to the Web Vote-by-Mail Request Queue in Voter Focus. This eliminates the need to rekey the information from the request forms into voter records. All that's required is to check the web request and give Voter Focus the go-ahead to insert it into the voter's record.

> **Note:** Mail ballot requests that require the voter to complete an affidavit because they chose to have the mail ballot delivered to a new address that is not currently on file with FVRS do not appear in the Web Vote-by-Mail Request Queue in Voter Focus to prevent premature data-entry.

Your county will also receive an email for each voter who has submitted a mail ballot request online. An email is not sent if the voter is required to complete an affidavit.

The email address submitted by the voter will be stored in the **E-Mail** field on the voter's **Vote-by-Mail** tab, replacing any previously entered email address. (These emails are not considered public record.)

For a list of the voters who have submitted web requests that have not yet been processed, run the Pending Web Absentee Requests report.

Processing a request from the website creates an entry on the voter's **Comms** tab called **Web Absentee Request**. Double-click this entry to see a summary of the request on the **View Web Absentee Request** dialog.

> **Note:** An entry is not made on the voter's Comms tab if the voter is required to complete an affidavit.

For more information about the processing of web requests, see Process Vote-by-Mail Requests Submitted on Your Website in the Voter Focus Help system.

For mail ballot requests that required an affidavit to returned, when the affidavit is received by your office, you can manually enter the vote-by-mail request. For more information see the following topics in the Voter Focus help system:

- Mail Ballot Request for a Specific Election
- Mail Ballot Request for All Elections
- Mail Ballot Request for Several Elections

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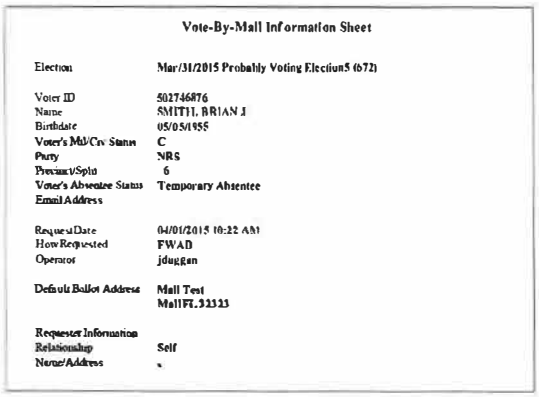
Vote-By-Mail Information Sheet

You have the option of printing this document when processing a Vote-By-Mail request or an in-office or pickup absentee from the Vote-By-Mail Request and Voting Election dialogs. The sheet prints to your default printer.



Vote-By-Mail Information Sheet

Election	Mar/31/2015 Probably Voting Election5 (672)
Voter ID	502746876
Name	SMITH, BRIAN J
Birthdate	05/05/1955
Voter's Mil/Civ Status	C
Party	NRS
Precinct/Split	6
Voter's Absentee Status	Temporary Absentee
Email Address	
Request Date	04/01/2015 10:22 AM
How Requested	FWAD
Operator	jduggan
Default Ballot Address	Mail Test Mail FL 32323
Requester Information	
Relationship	Self
Name/Address	

Print

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EXHIBIT G:

Second District Court of Appeal Judge Roster

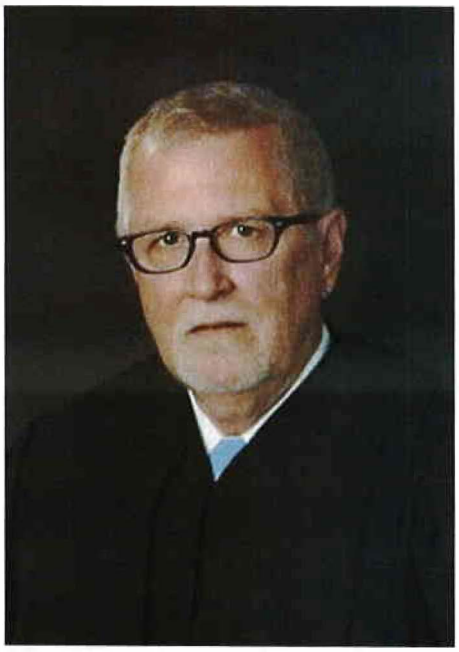
FLORIDA
SECOND DISTRICT COURT OF APPEAL

ACCESSIBLE | FAIR | EFFECTIVE | RESPONSIVE | ACCOUNTABLE

Second District Court of Appeal Judges

For more information about a judge, click on the judge's name.

Chief Judge Daniel H. Sleet
Years of Service: 2012 - Present



Judge Stevan T. Northcutt

Years of Service: 1997 - Present

Judge Morris Silberman

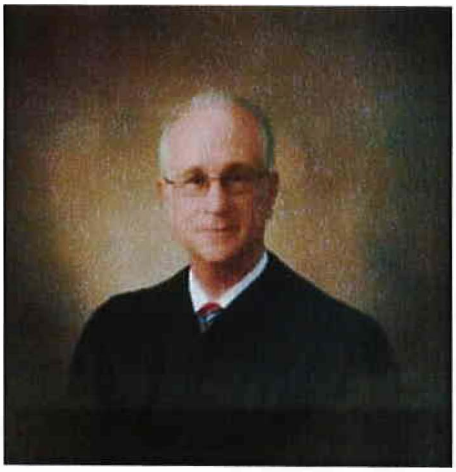
Years of Service: 2001 - Present

Judge Patricia J. Kelly
Years of Service: 2001 - Present

Judge Craig C. Villanti
Years of Service: 2003 - Present

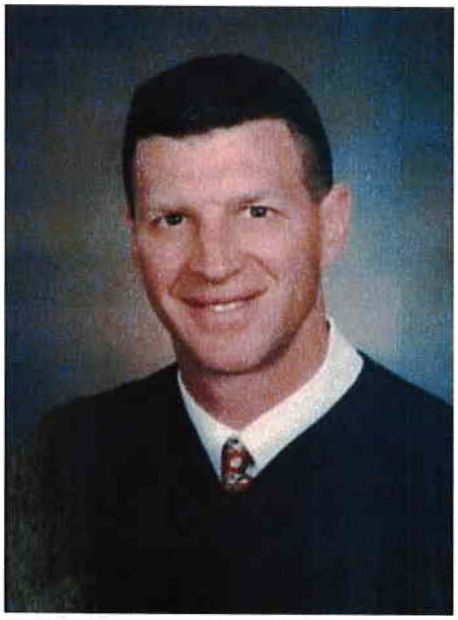
Judge Edward C. LaRose
Years of Service: 2005 - Present

Judge Nelly Khouzam
Years of Service: 2008 - Present



Judge Robert Morris

Years of Service: 2009 - Present



Judge Anthony K. Black

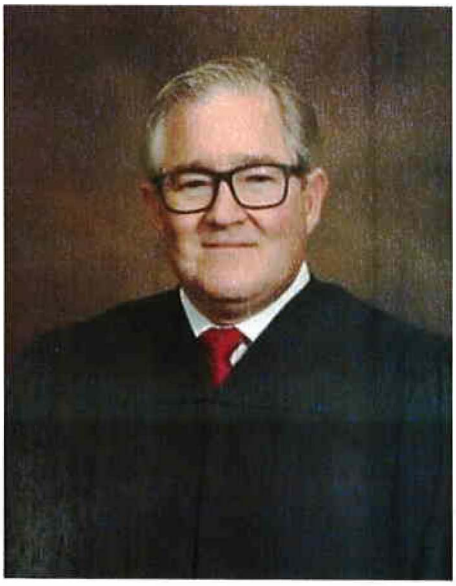
Years of Service: 2010 - Present

Judge Matthew C. Lucas

Years of Service: 2014 - Present

Judge Susan H. Rothstein-Youakim

Years of Service: 2016 - Present



Judge J. Andrew Atkinson

Years of Service: 2018 - Present

Judge Andrea Teves Smith

Years of Service: 2019 - Present

Judge Suzanne Labrit
Years of Service: 2020 - Present

Judge Anne-Leigh Gaylord Moe
Years of Service: 2025 - Present

Judges

Chief Judge Daniel H. Sleet

Judge Stevan T. Northcutt

Judge Morris Silberman

Judge Patricia J. Kelly

Judge Craig C. Villanti

Judge Edward C. LaRose

Judge Nelly Khouzam

Judge Robert Morris

Judge Anthony K. Black

Judge Matthew C. Lucas

Judge Susan H. Rothstein-Youakim

Judge J. Andrew Atkinson

Judge Andrea Teves Smith

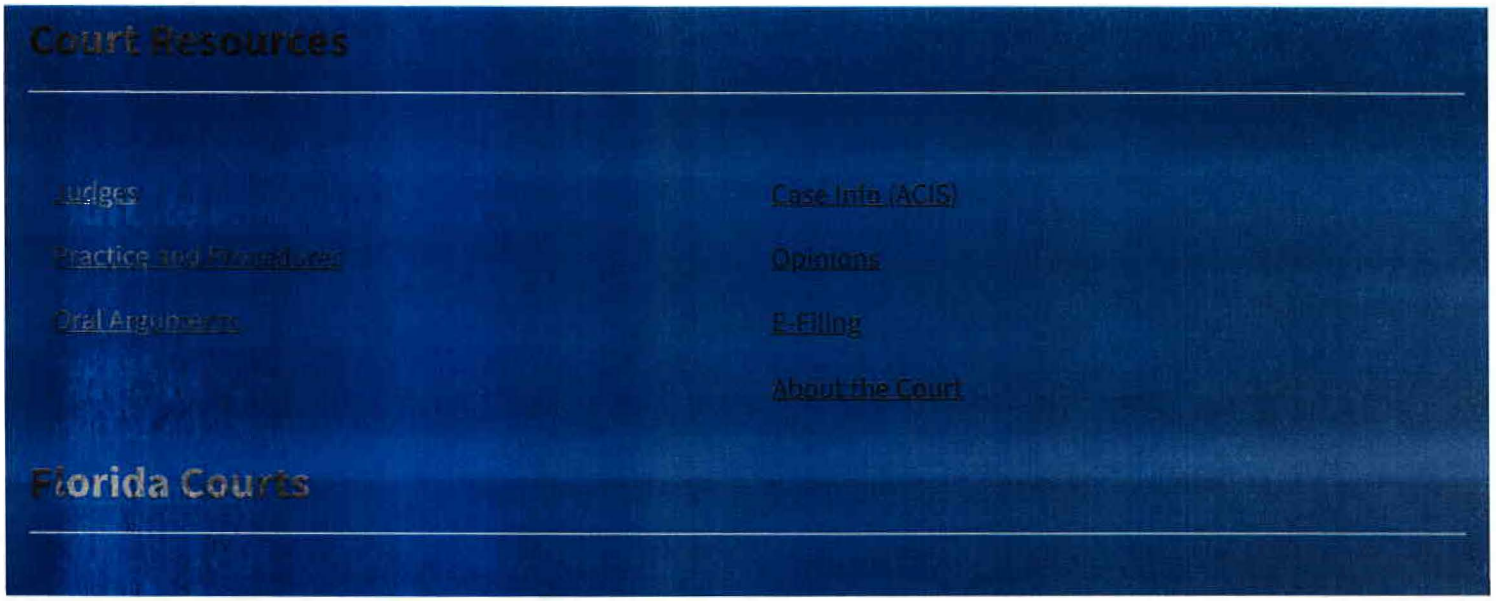
Judge Suzanne Labrit

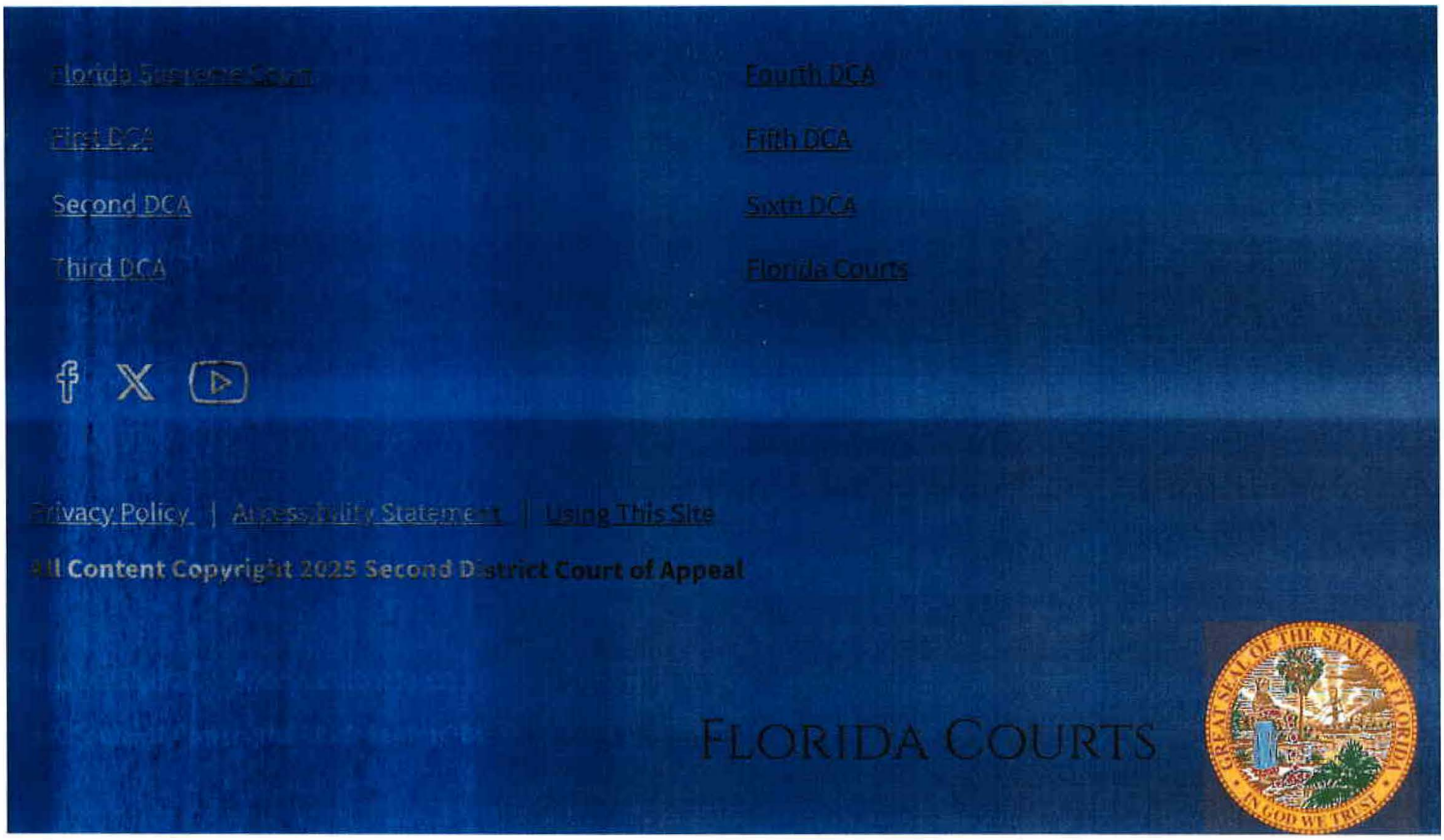
Judge Anne-Leigh Gaylord Moe

Former Judges

Current Judges

View a larger version of the photo




Florida Supreme Court
First DCA
Second DCA
Third DCA
Fourth DCA
Fifth DCA
Sixth DCA
Florida Courts
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FLORIDA COURTS

EXHIBIT H:

Affidavit of John Siamus (April 7, 2025)

AFFIDAVIT OF JOHN SIAMAS

REGARDING CHAIN OF CUSTODY FOR STATEWIDE VOTE BY MAIL

REPORTS AND THE IRREGULARITES OBSERVED WITH THE DATA

STATE OF FLORIDA)
) ss:
COUNTY OF PINELLAS)

Before me, the undersigned authority, personally appeared John Siamas, who, being duly sworn, states as follows:

Affiant's Identity

1. I, John Siamas, was a Republican candidate for the Florida State Sente District 21 Primary Election held on August 20th, 2024. I am over 18 and competent to make this affidavit and have personal knowledge of the facts stated herein.

Purpose of Affidavit:

2. This affidavit is made to establish the chain of custody for the Statewide Vote-By-Mail Report ("VBM") that I obtained directly from the Florida Division of Elections at the following url:

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports

Acquisition of Voting List:

3. I personally accessed the Florida Division of Elections secure online system for authorized individuals as clearly stated in FL Stat 101.62 and FAC 1S-2.043. I used the following secure URL

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports

provided to me by the Division of Elections to download the daily updates of the Statewide Vote-By-Mail Early Voting List.

Secure Download Process:

4. The Florida Division of Elections provided me access to the Voting List via the following secure link

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports ,

which required my unique login credentials provided by the Division. These credentials were assigned specifically for my use as a registered recipient of the Voting List after directly registering with the State at the following url:

https://countyballotfiles.floridados.gov/Account/Register

Receipt of Voting List:

5. Upon logging into the secure platform, I downloaded the Vote-By-Mail report, which was provided in .txt and/or .zip format. I saved the downloaded files directly to my computer under secure conditions, ensuring that the data was not altered.

Handling and Storage:

6. After downloading the Vote-By-Mail report, I took immediate steps to preserve the integrity of the data. The files were securely stored on my computer, which is protected by encryption and password protection. No unauthorized individuals had access to the Voting List from the time I downloaded it until it was submitted in connection with this case.

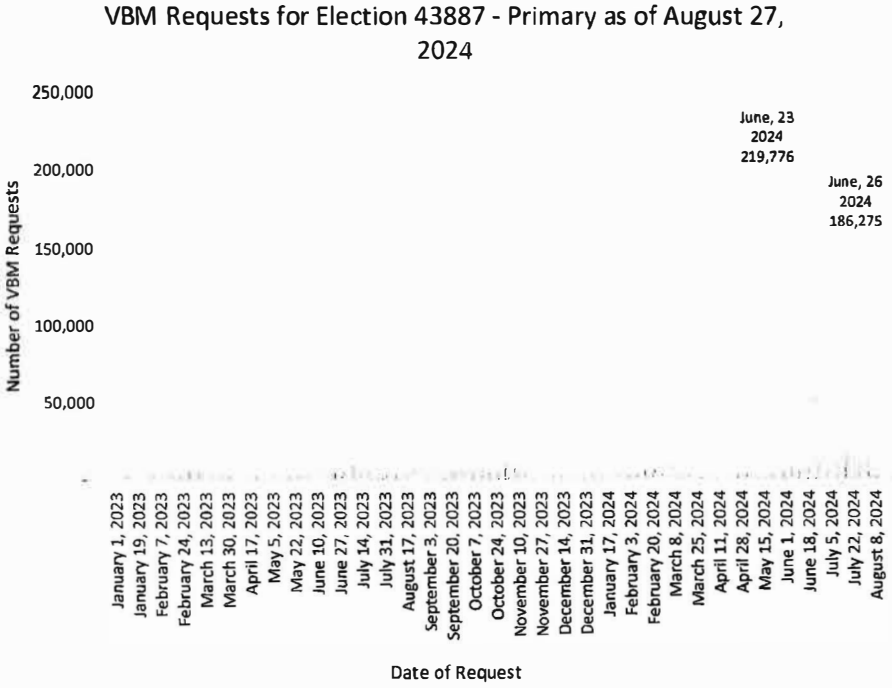
Integrity of the Data:

7. I affirm that the Voting List downloaded from the Florida Division of Elections has not been altered, modified, or tampered with in any way. The files I obtained are in the same condition as when I downloaded them directly from the Division's secure platform.

Irregularities and Anomalies with the Vote-By-Mail Ballots

8. Here are the following anomalies and irregularities in the vote-by-mail ballots and the system implemented to administer the vote-by-mail ballots:

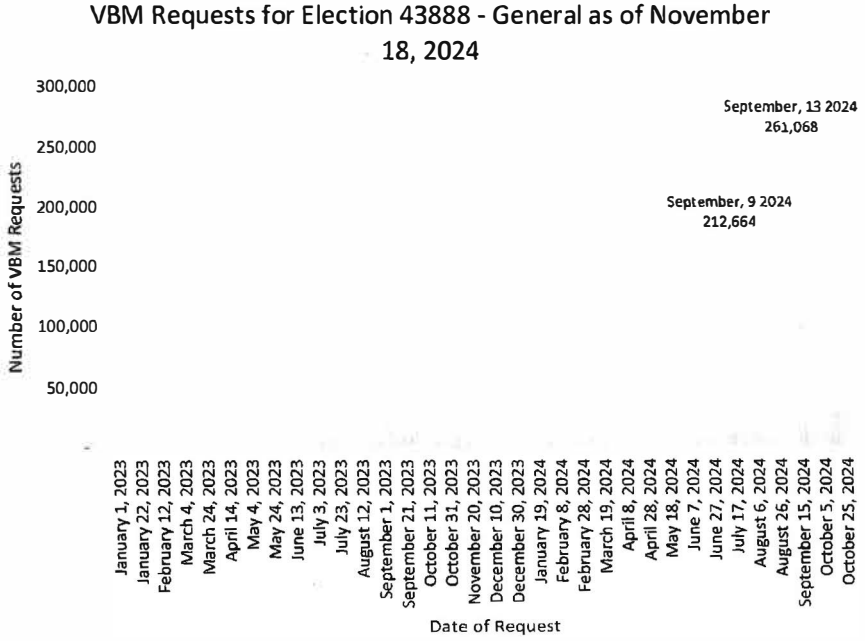
(1) When observing the vote-by-mail ballot (VBM) request data as of August 27, 2024, provided by the Florida Division of Elections for the primary elections, I noticed two very unusual outliers in the requests made. Here is a visualization of the daily requests made across the entire state in 2024:



(2) The two extreme outliers represent two dates, Sunday June 23, 2024, and Wednesday June 26, 2024. The number of vote-by-mail ballot requests made on June 23, 2024, was 219,776. The number of vote-by-mail ballot requests made on Wednesday June 26, 2024, was 186,275. The following is a factual analysis of these anomaly for the county of Pinellas:

a. On Sunday June 23, 2024, of the total 219,779 vote-by-mail ballot requests made, 219,675 vote-by-mail ballots requested were made from the Pinellas County Supervisor of Elections office. Of those 219,675 vote-by-mail requests from Pinellas County, according to the VBM Report dated August 27, 2024, provided by the State, 219,628 (99%) did not provide a Driver's License or Last 4 of SSN as part of the request. This is indicated by a "N" designator in the columns for the "FLDL/StatelD" and "VoterSSN4" in the report.

(3) When observing the vote-by-mail ballot (VBM) request data as of November 18, 2024, provided by the Florida Division of Elections for the general elections, I again noticed two very unusual outliers in the requests made. Here is a visualization of the daily requests made across the entire state in 2024:



(4) A The two extreme outliers represent two dates, Monday September 09, 2024, and Friday September 13, 2024. The number of vote-by-mail ballot requests made on September 09, 2024, was 212,664. The number of vote-by-mail ballot requests made on September 13, 2024, was 261,068. The following is a factual analysis of this anomaly for the county of Pinellas:

a. On Monday September 09, 2024, of the total 212,664 vote-by-mail ballot requests made, 196,037 vote-by-mail ballots requested were made from the Pinellas County Supervisor of Elections office. Of those 196,037 vote-by-mail requests from Pinellas County, according to the VBM Report dated November 18, 2024, provided by the State, 195,280 (99%) did not provide a Driver's License or Last 4 of SSN as part of the request. This is indicated by a "N" designator in the columns for the "FLDL/StatelD" and "VoterSSN4" in the report.

9. The following is a list of Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in both the Primary and General Elections per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judge	Campbell, Kim	107167732
Pinellas 6th Circuit Judge	Campbell, Pamela A	106758700
Pinellas 6th Circuit Judge	Coleman, Sherwood	106876672
Pinellas 6th Circuit Judge	Gnage, Brian	107285314
Pinellas 6th Circuit Judge	Handsel, Mary M.	106814594
Pinellas 6th Circuit Judge	Jirotka, George M.	106817396
Pinellas 6th Circuit Judge	Loar, Doneene	107338189

Pinellas 6th Circuit Judge	Matthey, Philippe	107385240
Pinellas 6th Circuit Judge	Moore, Patrice	106958587
Pinellas 6th Circuit Judge	Muscarella, Patricia A	106784723
Pinellas 6th Circuit Judge	Newton, Cynthia J	107071107
Pinellas 6th Circuit Judge	Ramsberger, Thomas M	107143704
Pinellas 6th Circuit Judge	Riba, Joshua	106991733
Pinellas 6th Circuit Judge	Siracusa, Pat	106772419
Pinellas 6th Circuit Judge	Todd, Kimberly	106869683
Pinellas 6th Circuit Judge	Westine, Lauralee G	106972664
Pinellas 6th Circuit Judge	Helinger, Jack	114340336

10. The following is a list of Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judge	Federico, Philip J.	106986554
Pinellas 6th Circuit Judge	Pearlman, Nicole	100554220
Pinellas 6th Circuit Judge	Stearns, James R	106750878
Pinellas 6th Circuit Judge	Williams, Amy M	106715884

11. The following is a list of Judicial Assistants for Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in both the Primary and General Elections per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judge Judicial Assistant for Judge Steve Berlin	Vincent, Melinda	106873482
Pinellas 6th Circuit Judge Judicial Assistant for Judge Kim Campbell	Hughes, Cyndi	106941212
Pinellas 6th Circuit Judge Judicial Assistant for Judge Pamela Campbell	Miele, Joann	106945217
Pinellas 6th Circuit Judge Judicial Assistant for Judge Elizabeth Jack	Leis, Amber	117384460
Pinellas 6th Circuit Judge Judicial Assistant for Judge Philip J. Federico	Psenisky, Jill	106978328
Pinellas 6th Circuit Judge Judicial Assistant for Judge Jack Hellinger	Scholl, Mary	107176725
Pinellas 6th Circuit Judge Judicial Assistant for Judge Patricia Moore	Trosky, Raelynn	107145889
Pinellas 6th Circuit Judge Judicial Assistant for Judge Shawn Crane	Smith, Louise	125032393
Pinellas 6th Circuit Judge Judicial Assistant for Judge Daniel D Diskey	Debi McCarty	107067204
Pinellas 6th Circuit Judge Judicial Assistant for Judge David Ellis	Wisman, Stacy	107118442
Pinellas 6th Circuit Judge Judicial Assistant for Judge George M Jirkota	Whitehall, Bonnie	124912657
Pinellas 6th Circuit Judge Judicial Assistant for Judge Thomas M Ramsberger	McGivern, Valerie	106981943
Pinellas 6th Circuit Judge Judicial Assistant for Judge Julie L Sercus	Rayburn, Jess	113659838

12. The following is a list of Judicial Assistants for Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State:

Title	Name	Voter ID
Pinellas 6th Circuit Judge Judicial Assistant for Judge Joseph Bulone	Nguyen, Annie	107054797

13. The following is a list of Relatives to the Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Relative of Judge Julie L Sercus	SERCUS, ELIZABETH A	123610805
Relative of Judge Julie L Sercus	SERCUS, FAITH A	111895803

14. The following is a list of County Judges of the Sixth Judicial Circuit of Florida and their Assistants, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judicial County Judge	Carassas, John	106835464
Pinellas 6th Circuit Judicial County Judge	Jagger, Edwin	106832762
Pinellas 6th Circuit Judicial County Judge	Pierce, James	106815101
Pinellas 6th County Judicial Assistant for Judge Edwin Jagger	Hall, Michelle	106720023

Pinellas 6th County Judicial Assistant for Judge Theodora Komninos	Masterson, Vicki	107150747
Pinellas 6th County Judicial Assistant for Judge Kelly Lorraine	Caffentzis, Joan	106926631
Pinellas 6th County Judicial Assistant for Judge Cathy McKyton	Nierengarten, Cheryl	107033524

15. The following is a list of the Florida Second District Court of Appeal Judges and their relatives, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
2nd DCA	Silberman, Morris	106869196
2nd DCA	Villanti, Craig C	113787369
2nd DCA	Khouzam, Nelly	106723453
Relative of Judge Matthew C Lucas of the 2ND DCA	Lucas, Cheryl L	107285166
Relative of Judge Susan H Rothstein-Youakim of the 2ND DCA	Rothstein, Rita M	122458841
Relative of Judge Susan H Rothstein-Youakim of the 2ND DCA	Rothstein, Arthur S	122246266

16. The following is a list of the Florida Supreme Court Judges, their assistants, and their relatives, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Supreme Court of Florida	Couriel, John D	117954867
Judicial Assistant to Supreme Court Judge Charles Canady	Williams, Brenda	109108119
Relative of Judge Jorge Labarga	Labarga, Maria A	110265650

17. The following is a list of Senior Assistant Pinellas County Attorneys in Pinellas County, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Senior Assistant Pinellas County Attorney	Sadowsky, David	106906875
Senior Assistant Pinellas County Attorney	Sanzeri, Carole	106790228
Senior Assistant Pinellas County Attorney	Schaefer, John	106839614
Senior Assistant Pinellas County Attorney	Ester, Jason	107005833
Senior Assistant Pinellas County Attorney	LeBlanc, Christina	107056302
Senior Assistant Pinellas County Attorney	Morrissey, Joseph	125661447
Senior Assistant Pinellas County Attorney	Steg, Betsy	106931757

18. The following is a list of Assistant County Attorneys and County Attorneys in Pinellas County, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM

Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Assistant County Attorney	Barrera, David	118419022
Assistant County Attorney	Kahn, Jared	111191787
Assistant County Attorney	Klein, Jeffrey	106650848
Assistant County Attorney	Lewis, Kelly	125247381

Title	Name	Voter ID
County Attorney	White, Maria	107153397

19. The following is a list of State Attorney for the Sixth Judicial Circuit of Florida Pinellas County and their relatives, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	Bruce, Robert	107387209
State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	Williams, Emily	107417811
Division Directory for the Sixth Judicial Circuit of Florida Pinellas County	Sullivan, Courtney	117723880
Division Directory for the Sixth Judicial Circuit of Florida Pinellas County	Koskinas, Thomas	107203473
Division Directory for the Sixth Judicial Circuit of Florida Pinellas County	Hill, Karen	106808845
State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	Festa, Noelle	107125137

Relative of Nathan Vonderheide State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	VONDERHEIDE, EMILY A	119836062
Relative of Noelle Festa State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	FESTA, THOMAS V	114538517

20. The following is a list of other significant individuals, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Relative of Pinellas County Sheriff Robert Gualtiere, Judge Lauralee G Westine	WESTINE, LAURALEE G	106972664
Supervisor of Election Pinellas County	Marcus, Julie	107075643
County Commissioner on Canvassing Board	POLSON, HERBERT E	106735562
County Commissioner on Canvassing Board	PETERS, KATHLEEN M	106894092

[AFFIANT SIGNATURE]

Sworn to and subscribed before me by means of X physical presence or _____ online notarization, this 7th day of April 2025 John Siamas

Notary Public – State of Florida

Notary Public State of Florida
Ethan Weaver
My Commission HH 432294
Expires 8/10/2027

Ethan Weaver
[PRINT, TYPE, OR STAMP NAME OF NOTARY PUBLIC]

Personally Known _____ OR Produced Identification X [CHECK ONE]

[Type of Identification Produced: [COMPLETE ONLY IF NOTARY REQUESTED IDENTIFICATION]] FL DL

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Google Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Select Language

Powered by Google Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Last Name:

Siamas

Date of Birth:

[redacted]

House Number of Voter's Residence Address:

[redacted]

Last Four Digits of SSN:

[redacted]

OR

Driver's License (or State ID) Number:

[redacted]

Search

Back

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email: Election@VotePinellas.gov (mailto:election@votepinellas.gov) | Public Records Request Form (/General-Information/Contact-Us/Public-Record-Request)**

P:(727) 464-VOTE (8683) • F:(727) 464-6239

Election Service Center
13001 Starkey Rd.
Largo, FL 33773
(Starkey Lakes Corporate Center)

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

County Building
501 First Avenue North
St. Petersburg, FL 33701
(Fifth Street North Entrance)

F.S. 668.6076 Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. To submit a public records request, use this form. (/General-Information/Contact-Us/Public-Record-Request)

EXHIBIT I:

VR Systems Manual: “Dialog: Vote-By-Mail Request”

Vote-By-Mail Request

To access: **VOTER REGISTRATION > Voter Maintenance > {*voter*} > Vote-By-Mail** tab **> New Request** or **All Elections** or **Federal Post Card App**

or

Vote-By-Mail > Vote-By-Mail Request > {voter}

On the **Vote-By-Mail Request** dialog you can:

Record a voter's request(s) for mail ballots.

Maintain addresses where mail ballots are to be sent.

The "state" of this dialog depends on whether you are making a single request, an all-elections request, an FPCA request, or a request for all elections through a specific date range. The type is shown in the **Request Type** box and, in the case of the All Elections and FPCA types, all elections for which the voter is eligible will be selected. For a single request or a request for several specific elections, you will need to select the **Request** field for each election where the voter wants a mail ballot.

The box in the center of the dialog lists the elections whose status is Open, Active, or Return Processing Only, showing the voter's Vote-By-Mail status for each election. A blank status indicates the voter is eligible to vote in the election but has not requested a mail ballot. When you first access the dialog, the requests are sorted by election date with the most future election first. To sort by another criterion, click the column heading of the column you want to sort by.

The buttons in the **Change Address** column let you add a default ballot address (if used by your county) or a Ballot Address for This Election. Double-click an **Add Address** or **Change Address** button to open the Vote-By-Mail Addresses dialog where you can add or update an address. Note that if you change the Default Ballot Address for one request, it changes this address for all requests. The Ballot Address for This Election is for the selected request only.

Fields and Controls on this Dialog

Save — Saves the request without printing an address label or Vote-By-Mail Information Sheet. If you want to print these documents, click **Save and Print** instead.

Save and Print — Saves the request and prints a Vote-By-Mail Information Sheet to your default printer. You can use this document to verify the correct information was entered into the database. Some counties attach the sheet to the Vote-By-Mail Request, if a paper request is available.

If the **How Requested** field is a pick-up value (Pick-up or 3rdParty) and your Voter Focus system is set up for printing labels (**VOTER FOCUS ADMIN > System Options > Vote By Mail > Vote-By-Mail Label Options**), clicking **Save and Print** also prints an address label with a bar code to your label printer. You can affix the label to the return envelope.

Utilities > Local Printer Options — Opens the Local Printer Options dialog where you can select a label printer and page printer for your workstation.

Default Ballot Address — Opens the Vote-By-Mail Addresses dialog where you can enter addresses to which ballots should be sent other than the voter's mailing or residence address.

Vote-By-Mail Status

Permanent—A voter who is expected to Vote By Mail indefinitely. This status is typically used for voters who have asked to receive the annual Notice of Elections each year.

This status allows voters to request mail ballots for all or select elections held through the end of the calendar year of the next regularly scheduled general election.

Temporary—A voter who wants to Vote By Mail in one or more elections but who has not asked to receive the annual Notice of Elections. The Voter Focus administrator has the option of resetting the absentee status of Temporary voters to Cancelled at the end of an election year. (See Clear Temporary Vote-By-Mail Statuses.)

Cancelled (or no status selected)—The voter has no mail ballot requests in their record.

FPCA Applicant—A mail ballot voter who has requested ballots using the Federal Post Card Application form. The FPCA form allows military voters, their dependents, and civilian voters residing outside the United States to make a single request for mail ballots through the end of the calendar year of the next regularly scheduled general election held after the request date unless the voter indicates a shorter time period or a specific election in which they want to vote.

Note:

An upcoming general election is not considered the *next general election* if the all elections request is submitted after 5:00 pm of the 6th day prior to the upcoming election date.

The voter's *FPCA Applicant* status does not remain in their voter registration record should they change their residence to another county. If the voter wants to maintain FPCA status, they will need to submit another FPCA form to the elections office in their new county.

The *FPCA Applicant* status reverts to a blank status when the FPCA request expires at the end of the calendar year.

Comment — A 25-character field for user notes. Should you need more space than the 25 characters provided, type *See Communication Log* in the **Comment** field. Then go to the voter's record and create an office note.

Some counties use this field to record the voter's phone number when the voter has asked that the number not be included in their voter registration record. In such cases, the phone number is omitted from the **Telephone** field on the voter's **Maint** tab and entered into the **Comment** field on the Vote-By-Mail Request dialog, which is not public record.

E-Mail If the voter provided an email address, enter it here. The system will attempt to validate the email address by verifying it contains proper syntax, such as an @ sign before the domain name. This doesn't guarantee that the email address is valid, but it will identify those that cannot be mailed by your SMTP server.

If the voter submits a mail ballot request through your website, when the request is processed, the email address submitted by the voter will be stored automatically in this field, replacing any previously entered email address.

The email address entered here will be used by the Email run for voters requesting delivery of their ballot by email. It will also be used for the Vote-By-Mail notification runs and list-of-candidate runs.

You can create an email message from yourself to the voter by holding down the Ctrl key on your keyboard and clicking the email address. This feature requires that your workstation have an email client such as Microsoft Outlook installed. Web based email systems are not supported for these "one-off" emails.

Email addresses are reported in the reports Absentee Status for all Absentee Voters, Absentee Status for Email/Fax Delivery Voters, and the Unsent Email/Fax Absentee Ballots.

> **Note:** Voter email addresses can be made available to candidates and political parties, but they are exempt from public records requests by other entities. When creating a report or export file in response to a public records request, you should remove the email addresses from the report/export file before releasing it to the requestee.

Military Select this check box to turn on the military setting for this voter. The military setting is used for reporting purposes; it does not ensure that the voter will be included in early batches of mail ballots sent to overseas voters. To be included in the early overseas batch, the voter's Vote-By-Mail address must be set up a particular way for overseas. See Addresses_for_Overseas_Voters for more information.

If you change this setting, all requests made after the change will have the new setting, but requests made prior to the change will retain the old setting. In the voter's registration record, the **Military** setting can be changed for an individual mail ballot request, without affecting the setting here. See Mail-Ballot Adjustments for more information.

Mil Dep Select this check box to turn on the military dependent setting for this voter. Voters with the military dependent setting are treated the same as military voters; that is, they are included in the mailing lists and report totals of military voters. Note that both military settings (**Military** and **Mil Dep**) cannot be selected; you must choose one or the other.

Supervised Voting The voter resides at an assisted living or similar facility, wants their Vote-By-Mail ballots delivered to the facility, and needs supervised voting at their facility.

Request Type The value here depends on how you accessed this dialog, whether a new (single) request, an all-elections request, or an FPCA request.

Single Election—You can record a request for one or more specific elections by checking the **Request** check box for the election(s).

All Elections or **FPCA**—Automatically selects the **Request** check boxes for all elections listed for which the voter is eligible and enters a date in the **Expiration of All Elections** year field. If the voter does not wish to vote in a specific election, you can clear the **Request** check box for that election.

Note:

Should the voter move to another Florida county prior to the expiration date of their all-elections or FPCA request, the request will not move with their voter record. The voter will need to make another all-elections or FPCA request in their new county.

If a voter previously made an all-elections or FPCA request, processing undeliverable mail with no change of address or an out-of-state address automatically triggers the cancellation of any outstanding requests for future elections (unless a ballot has already been delivered), sets the expiration date of the all-elections/FPCA request to today's date, and schedules a Canceled Requests Notice to be sent to the voter.

Expiration of All Elections The field indicating the expiration year defaults to the end of the calendar year in which the second regularly scheduled general election after the request date occurs. For example, if a voter makes an all-elections request in July 2010, the request will expire on Dec. 31, 2012. The year can be changed to an earlier date if the user requests a shorter time period for receiving mail ballots. It can also be changed to a later date that is no later than two years of the default expiration date.

This field will be cleared and become uneditable if you deselect the **Request** check box for an election and the voter is not an FPCA voter.

Request Status Indicates the current status of each request. Possible statuses include:

Vote-By-Mail option not set for this election—The election has not been set up for mail ballots. (This is done in **ELECTIONS > Maintain Election Settings > Election Maintenance > Vote-By-Mail Requests**.)

Already Requested—If the voter already has a Vote-By-Mail Request for this election.

Election is After the Next General—If the election occurs after the end of the calendar year of the second general election, which will be after the all-elections or FPCA request has expired.

Request Cancelled—If the voter cancels their previous request for a specific election

Voter not in the city—If the voter does not reside in the city where a city election is scheduled.

Voter's party not voting—If the election is a primary and the voter's party is running no candidates.

Voter's precinct not voting—If the voter's precinct is not voting in the election.

Change Address/Add Address Click to open the Vote-By-Mail Addresses dialog where you can enter a default ballot address for all elections (if you county permits this type of address) or a Ballot Address for this Election.

Request Select to record a Vote-By-Mail Request for specific elections.

Print Request Select to print a Vote-By-Mail Information Sheet when you save the dialog.

Voter Record Verification Info The driver's license/state ID number or the last four digits of the Social Security Number from the voter's record.

Requestor Information Use this area to record the requestor's information, whether they are a third party or the voter themself.

After entering the requestor's name and address, in the Relationship field, select one of the available options:

When the request is made by the voter or the ballot is picked up by the voter, this field should show *Self*.

To enter a request from someone other than the voter, the person must be a member of the voter's family (one of the options listed in the field) or their legal guardian.

If someone else picked up a ballot for the voter, you can select from the list or enter something else, such as *Neighbor*.

Important: The State requires that vote by mail ballot requests include the last four digits of the requestor's Social Security Number or the driver's license/state ID number and that the type of ID provided for the voter is indicated. If the requestor is anyone except Self, make sure the Requestor DLN or Requestor Last4SSN field is filled out in addition to the Voter DLN or Voter Last4SSN.

Note: Identifying information for the voter (DLN or Last4SSN) entered here is included in the Vote-By-Mail Ballot Request Information daily file.

How Requested Select the way the voter requested the ballot. The options listed in the drop-down list will depend upon the status of the election:

Open elections—Requests can be made:

Person—In person.

Mail, **Phone**, **Fax**, or **E-Mail**—By mail, phone, fax, or email.

Web—Via the elections office website.

No ballots can be issued while the election status is Open.

Active elections—Requests can be made in the same way as in Open elections. You can also issue mail ballots and receive Federal Write In Absentee Ballots, so these options are added to the list:

Online—Used by counties participating in the Federal Voting Assistance Program (FVAP), which allows UOCAVA voters to request and receive ballots online.

Pick-up—The voter requested and picked up their ballot from the Supervisor's office. Pickup ballots can be issued up to 49 days in advance of the election. If your county uses ballot numbers for pickup voters, when **Pick-up** is selected, the **Ballot Number** field appears so you can enter the number of the ballot issued to the voter. The delivery method is automatically set to **PkUp**.

Note: Ballot printing for pickups and third-party pickups is not supported on this dialog. If your county uses the ballot printing feature, pickups should be processed on the Voting Election dialog.

3rdParty—The ballot was requested and picked up by a third party presenting the voter's signed request that the ballot be given to the third party. If your county uses ballot numbers for pickup voters, when **3rdParty** is selected, the **Ballot Number** field appears so you can enter the number of the ballot issued to the voter. The delivery method is automatically set to **3rdP**.

FWAB—The voter has submitted a Federal Write In Absentee Ballot. Only voters who are absent uniformed service members or citizens residing outside the United States can use this type of ballot.

Return Processing Only elections—Requests for mail ballots can no longer be taken, but ballots can be issued, so the options are Pick-Up, 3rdParty, FWAB and Online.

Requested Delivery Select the delivery method to be used when no delivery method has been specified for a particular election. The delivery method specified for a voters previous Vote-By-Mail Request is selected by default. If this is the first Vote-By-Mail Request for the voter, the default value will be **Mail**.

If the voter wants a different method of delivery for a particular election, the delivery method for that election can be changed on the Mail-Ballot Adjustments dialog, which is accessed from the **Vote-By-Mail** tab in the voter's registration record.

Mail—If the voter provided an address, you will need to enter it on the Vote-By-Mail Addresses dialog. To open this dialog, click the **Add Address** button in the **Change Address** column in the list of elections.

Email—For email delivery, you will need to enter the voter's email address in the **E-Mail** field.

Fax—For fax delivery, you will need to enter the voter's fax number on the Vote-By-Mail Addresses dialog. To open this dialog, click the **Add Address** button in the **Change Address** column in the list of elections.

Accessible Online—When the **How Requested** field is **Online**, the **Requested Delivery** field will be set automatically to **Accessible Online**. This delivery option will only appear for All Elections requests.

Note: Only UOCAVA voters can receive ballots by email, fax, or online. For non-UOCAVA voters, the **Online** option is unavailable.

Date Requested This field displays the current date and time. If the request was received earlier than today, change the date to reflect the actual date you received the request. The date you enter will stick as the default request date for subsequent requests for this voter until you change the date or restart the program. After a restart, this field reverts back to the current date and time.

Issue Ballot If you selected **Pick-up** or **3rdParty** in the **How Requested** field and the election is Active, the **Issue Ballot** box will appear.

How Delivered—If you chose Pick-Up or 3rdParty in the How Requested field, the How Delivered field defaults to Pkup or 3rdP, respectively.

Ballot Number—If your county uses ballot numbers, enter the number here. Entry of a ballot number for faxed or emailed ballots is optional if your county prefers to assign the ballot number after the faxed or emailed ballot has been returned and the votes transposed to an actual ballot.

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Process Mail Ballot Requests Received

Vote-by-mail requests submitted via the Mail Ballot Request Service are sent to the Web Vote-by-Mail Request Queue in Voter Focus. This eliminates the need to rekey the information from the request forms into voter records. All that's required is to check the web request and give Voter Focus the go-ahead to insert it into the voter's record.

> **Note:** Mail ballot requests that require the voter to complete an affidavit because they chose to have the mail ballot delivered to a new address that is not currently on file with FVRS do not appear in the Web Vote-by-Mail Request Queue in Voter Focus to prevent premature data-entry.

Your county will also receive an email for each voter who has submitted a mail ballot request online. An email is not sent if the voter is required to complete an affidavit.

The email address submitted by the voter will be stored in the **E-Mail** field on the voter's **Vote-by-Mail** tab, replacing any previously entered email address. (These emails are not considered public record.)

For a list of the voters who have submitted web requests that have not yet been processed, run the Pending Web Absentee Requests report.

Processing a request from the website creates an entry on the voter's **Comms** tab called **Web Absentee Request**. Double-click this entry to see a summary of the request on the **View Web Absentee Request** dialog.

> **Note:** An entry is not made on the voter's Comms tab if the voter is required to complete an affidavit.

For more information about the processing of web requests, see Process Vote-by-Mail Requests Submitted on Your Website in the Voter Focus Help system.

For mail ballot requests that required an affidavit to returned, when the affidavit is received by your office, you can manually enter the vote-by-mail request. For more information see the following topics in the Voter Focus help system:

- Mail Ballot Request for a Specific Election
- Mail Ballot Request for All Elections
- Mail Ballot Request for Several Elections

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EXHIBIT J:

VR Systems Manual: "About Capturing

Questionable Vote-By-Mail Requests from the Web"

Capturing Questionable Vote-By-Mail Requests from the Web

Voter Focus offers an optional feature to help detect fraudulent Vote-By-Mail requests submitted on your website through the Absentee/Mail Ballot Request Form. The requests are blocked from being processed into voter records, thus preventing the release of mail ballots to those intent upon voter fraud.

To use this feature, you run the Fraud Detection program, which scans requests from a specified time period, looking for those originating from the same IP address or having the same email address for ballot delivery. Requests whose addresses present no issue are passed to the Web Request Queue for processing into voter records. But questionable requests are detained for user review.

During your review, you can release a detained request to the Web Request Queue or you can put an indefinite hold on it. Where an address is known to be legitimate, you can set the Fraud Detection program to pass all requests associated with that address.

The Fraud Detection feature is under **Vote By Mail > Vote-By-Mail Fraud Detection**. To see this feature, your county must have this option selected:

VOTER FOCUS ADMIN > System Options > Vote By Mail > Use Vote-By-Mail Fraud Detection

And the user must have the permission:

VoteByMailFraudDetection

We recommend you run the Fraud Detection program and evaluate its findings on a daily basis.

How Fraud Detection Works

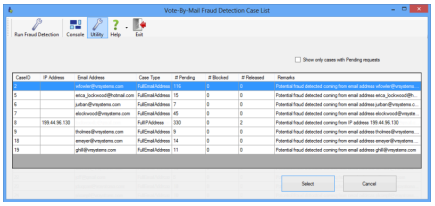
The Fraud Detection program uses these parameters on the Vote-By-Mail Fraud Detection Parameters dialog to determine whether a request should be held for review:

Email Threshold—The number of requests having the same email address at which the program will begin capturing the requests. For example, if the threshold is 5, the program will pass the first four requests with this email address but will detain the fifth and all subsequent requests with this address.

IP Address Threshold—The number of requests having the same IP address at which the program will begin capturing the requests. As with the email threshold, the program will detain any request meeting or exceeding the threshold.

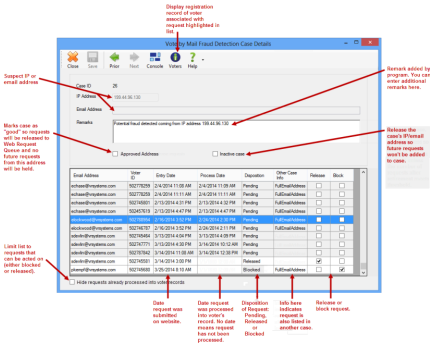
Date of First Web Request to be Analyzed—The date at which the program will begin evaluating web requests. This date must be at least a year in the past. The program will look at all requests submitted on this date and thereafter until today, including those that have already been processed into voter records.

The program checks all requests submitted on the website, beginning with the first request on the start date, placing a hold on any request exceeding the email or IP address threshold, except for those that have already been processed into voter records. It then presents the user with its findings, organized as a list of fraud *cases*, as shown in the screenshot below. Each case contains the web requests exceeding the threshold for a particular IP or email address.



You can then open a case, examine its requests, and make determinations on individual requests within the case or a general determination on the case itself:

- For individual requests, you can either release the request, block it, or leave it pending. A released request goes to the Web Request Queue where it can then be processed into the voter's record by the county user responsible for web request processing. Released requests continue to appear in the case list, as do requests that have been processed. If you don't want to see processed requests, you have the option of hiding them, so you can focus on requests that can still be acted upon.
- For cases where the address is known to be legitimate, you can mark the address as approved, which releases all requests in the case to the Web Request Queue and allows any future requests associated with the address to be passed by the fraud detection program. Approving an address lets you pass requests from known locations, such as public libraries, where voters might use public computers to submit Vote-By-Mail requests.


Display registration record of voter associated with request highlighted in list.
Vote-By-Mail Fraud Detection Case Details
Close
Save
Prior
Next
Console
Voters
Help
Case ID
IP Address
Email Address
Remarks
Approved Address
Inactive case
Suspect IP or email address
Marks case as "good" so requests will be released to Web Request Queue and no future requests from this address will be held.
Remark added by program. You can enter additional remarks here.
Release the case's IP/email address so future requests won't be added to cases.
Limit list to requests that can be acted on (either blocked or released).
Hide requests already processed into voter records
Date request was submitted on website.
Date request was processed into voter record. No date means request has not been processed.
Disposition of Request: Pending, Released, or Blocked
Info here indicates requests also listed in another case.
Release or block request.

Disposition of Requests

Web requests have one of three dispositions:

Pending—For counties using fraud detection, all web requests are assigned this disposition when they come into the Voter Focus system.

Note: For counties not using fraud detection, web requests are automatically assigned the Released disposition when they enter the system. Should a county turn on the fraud detection option, those requests will appear in a case should either of their addresses meet a threshold, but their disposition will remain Released. Should the county turn off fraud detection, the disposition of all web requests will be changed to Released.

Released—This disposition is assigned by the user upon determination that the request is legitimate. It allows the request to enter the Web Request Queue for processing into the voter's record. Requests with the disposition Released will continue to appear in the case, even after they have been processed. If a county does not use fraud detection, all web requests are assigned the disposition Released.

Blocked—This disposition is assigned by the user upon determination that the request is fraudulent. It prevents entry of the request into the Web Request Queue. Should a Blocked request be reevaluated later as legitimate, it can be released by selecting the **Release** check box on the Vote By Mail Fraud Detection Case Details dialog.

If a request appears in more than one case and you change its disposition in one of those cases, the change will be reflected in the other case.

Running the Fraud Detection Program

To run the Fraud Detection program, go to **Vote By Mail > Vote-By-Mail Fraud Detection > Run Fraud Detection**. During the run, if the programs finds new requests matching an existing case, it adds those requests to the case and displays a message indicating how many were added. If the program finds a new address meeting one of the prescribed thresholds, it will ask if you want to create a new case. If you say yes, the new case is added to the list of existing cases on the Vote-By-Mail Fraud Detection Case List dialog. If you say no, the requests associated with the suspect address will still be marked as Pending, even though a case has not been created. On subsequent runs of the program, if the same thresholds are used, you will be asked again if a new case should be created for those requests.

When counting the requests to meet one of the prescribed thresholds, the program does not consider whether a request has already been processed from the Web Request Queue into a voter's record. The first requests from an IP or email address that do not meet the threshold will not be stopped by the Fraud Detection program, so it is possible that a new case will contain requests that have already been processed, delivered, and perhaps even voted. (The same is true for requests processed before the county began using the fraud detection facility.) These requests cannot be "pulled back" or otherwise blocked by the Fraud Detection program.

The program does not evaluate the election for which a request is being made; requests for different elections can appear in a single case.

An all-elections request is considered a single request for the purpose of the Fraud Detection program.

Approving "Good" Addresses

In situations where an IP or email address is from a known legitimate source, you can mark the address as approved. This releases all requests in the case to the Web Request Queue unless a request appears in another case where the address is not approved. Approving an address allows any future requests associated with the address to be passed by the Fraud Detection program. To identify a case as good, select **Approved Address** on the Vote-By-Mail Fraud Detection Case Details dialog.

Note that if you select **Approved Address** and then clear this check box, the disposition of individual requests in the case will be reset to the settings in the last saved version of the case.

Making a Case Inactive

A case can be made inactive, which releases the once questionable IP or email address so that future requests with the address will be passed by the Fraud Detection program. This allows for situations where an internet service provider dynamically assigns a previously questionable IP address to a new, presumably legitimate location.

If you inactivate a case—by selecting **Inactive Case** and clicking **Save** on the Vote By Mail Fraud Detection Case Details dialog—the disposition of any requests in the case is essentially frozen. Inactive cases do not appear on the Vote-By-Mail Fraud Detection Case List, so the case itself can no longer be viewed and the disposition of requests in the case cannot be changed, unless they happen to appear in other, still active, cases.

Fraud Detection Reports

- Active Cases in Vote-By-Mail Fraud Detection
- Approved Addresses in Vote-By-Mail Fraud Detection
- Blocked Requests in Vote-By-Mail Fraud Detection
- Inactive Cases in Vote-By-Mail Fraud Detection
- Questionable Web Requests for an Election

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Vote-By-Mail Flexible Report

To access: **REPORTING > Reports > Vote-By-Mail Reports > Vote-By-Mail Voter Lists > Vote-By-Mail Flexible Report**

You can create reports tailored to your specific needs by selecting from mail ballot-related criteria on this dialog. Refer to the following topics for some examples of how the Vote-By-Mail Flexible report can be run:

Absentee Status for All Absentee Voters

Absentee Status for Domestic Voters

Absentee Status for Email/Fax-Delivery Voters

Absentee Status for Military & Civilian Overseas Voters

Unsent Email/Fax Absentee Ballots

FWAB Ballots Received

> **Note:** Protected voter addresses are not included in any report produced from this dialog.

Fields and Controls on this Dialog

Output Format	**Status Report**—Produces an onscreen report in Crystal Report format. **Vote-By-Mail Status Export**—Produces a file in either TXT or XLS format. The report lists voters meeting the criteria specified for the report run. **Vote-By-Mail Ballot Export**—Produces a file in either TXT or XLS format. The report returns information on mail ballots meeting the criteria specified for the report run. **Note:** The first two options—**Status Report and Vote-By-Mail Status Export**—query the database table where mail-ballot requests are recorded, so you can expect these outputs to return only one entry per voter. If a voter requested a second or third ballot, only the last ballot they requested is reported. The third option— **Vote-By-Mail Ballot Export**—queries the database table where mail ballots are recorded, so there can be multiple entries for a voter if they were sent more than one ballot.
Absentee Status	The status of the ballots reported: • Requested, not Delivered • Delivered, not Returned • Returned • All (requested, delivered, and returned ballots)
Date Selection (Requested, Ballot Delivered, Ballot Returned)	Click **Select Dates** and enter the starting and ending dates of the time period to be reported.
Disposition	*Available only when **Absentee Status** is **Returned**.* Select one of the ballot dispositions (**Accepted**, **Referred**, or **Returned Undeliverable**) or a single referral reason (**Referral Code**).
Location	Select one of the voter categories to report: • Civilian Domestic • Civilian Overseas • Domestic Military • Absent Domestic Military • Military Overseas • UOCAVA (includes Civilian Overseas, Absent Domestic Military, and MilitaryOverseas) • All (includes all Vote-By-Mail voters for the election) The category reported will be the voter's category at the time the ballot was mailed/emailed/faxed to the voter.
Supervised Voters	**Include**—In the report, include supervised voters. **Exclude**—Do not include supervised voters. **Only**—Report only on supervised voters and exclude all other voters.
Delivery Method Requested	Select the ballot delivery method requested by the voter (Accessible Online, Email, Fax, or Mail). Leave this field blank to report on all delivery methods requested.
How Requested	*Not available when **Output Format** is **Vote-By-Mail Ballot Export**.* Select the method by which the voter requested their mail ballot (such as Mail, Phone, Fax, Email, FWAB, FPCA, etc.).

How Delivered	*Not available when **Absentee Status** is **Requested, not Delivered**.* Select the method by which the ballot was delivered to the voter (Accessible Online, Pickup, Fax, Mail, Email, or Third Party).
How Returned	*Available only when **Absentee Status** is **Returned**.* Select the method by which the ballot was returned to the elections office (Mail, Email, Fax, Counter (in-office absentee), and Early Vote). **Note:** Not all of the returned options will be available for elections in the past. The ballot returned field for all ballots was introduced in the 2012 release of Voter Focus. Prior to that, ballot returned data was collected only for overseas ballots. For very old elections, this data was not collected at all.
Include Protected Voters	Include voters with protected addresses in the report.
Party Selection	Click **Select Parties** and select the political party affiliations to be reported. The party reported will be the voter's party at the time the ballot was mailed/emailed/faxed to the voter.
District Selection	Select a district to report from the drop-down list or leave this field blank to report on all districts.
Ballot Style Selection	*Not available when **Absentee Status** is **Requested, not Delivered**.* Click **Select Ballot Styles** to show a list of the permanent ballot styles for this election and select one or more ballot styles to report. To report on all ballot styles, leave this field blank.
Precinct Selection	Click **Select Precincts** to show a list of the precincts voting in this election and select one or more precincts to report. To report on all precincts, leave this field blank. The precinct reported will be the voter's precinct at the time the ballot was mailed/emailed/faxed to the voter.
Print Specification	Click to print a copy of the dialog with your current selections.
OK	Click to run the report with the selected parameters.

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EXHIBIT K:

VR Systems Report: “Questionable Web Requests for an Election”

Questionable Web Requests for an Election

To run: **REPORTING > Reports > Vote-By-Mail Reports > Fraud Detection Reports > Questionable Web Requests for an Election**

This report lists the Vote-By-Mail requests submitted on the county's website that might be fraudulent. It groups requests by matches such as the source IP address, requestors other than the voter, the delivery mailing address, email address, or fax number, and voter ID.

For more information on Vote-By-Mail fraud detection, see About Capturing Questionable Vote-By-Mail Requests from the Web.

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EXHIBIT L:

VR Systems Dialog: “Mail-Ballot Adjustments”

Mail-Ballot Adjustments

To access: **Voter Maintenance > {*voter*} > Vote-By-Mail** tab **> {*election*} > Mail-Ballot Adjustments**

This dialog lets you make various changes an existing mail ballot or early voting request for an election, including:

- Recording when a ballot has been issued and how it was issued.
- Canceling a request for a mail ballot.
- Changing the request from Military to Civilian. This is important because military ballots (Military Overseas and Military Domestic) are mailed out earlier than their civilian counterparts.
- Recording the release of replacement ballots.
- Reversing the release or return of ballots.
- Reversing votes cast during early voting and in-office absentee voting.
- Preventing the return of a mail ballot.
- Changing the delivery method from mail to email or fax.

Adjustments to Vote-By-Mail and early voting requests are automatically reflected in the various Vote-By-Mail and early voting reports. For example, changing the **Mil/Civ** setting affects where the request is listed in the Absentee Totals for an Election report, which lists military and civilian mail ballot voters separately. Changing a voter's delivery from mail to email or fax removes the voter from the Deliver Ballots run and adds them to the Unsent Email/Fax Absentee Ballots report.

See Make Adjustments to Existing Mail-Ballot Requests for specific instruction on adjusting requests under various scenarios.

Certain buttons on the dialog may be disabled based on ballot status or user permission. For example, the **Reverse Return of Ballot** button is disabled if the voter has not returned an issued ballot or cast an early vote.

With the exception of changes to the **Mil/Civ** field, adjustments to a request are immediately recorded in the Voter Focus database and can be seen on the Absentee Activity Dump report as soon as they are made. For instance, if you reverse delivery of a ballot and click **Audit Report**, you can see the reversal, even though you haven't yet saved your changes.

Fields and Controls on this Dialog

Delivery Method	Indicates how the ballot will be delivered. The value defaults to the method requested by the voter when they made the Vote-By-Mail Request, but you can change it to another method if the voter changes their mind. The options here are: **Mail**—For mail delivery, if the voter provided a Vote-By-Mail address, you will need to enter the address on the Vote-By-Mail Addresses dialog. **Email**—For email delivery, you must enter the voter's email address in the **E-Mail** field on the voter's Vote-By-Mail tab. **Fax**—For fax delivery, you must enter the voter's fax number on the Vote-By-Mail Addresses dialog. Selecting **Email** or **Fax** automatically sets an overseas condition for the voter for this election.
Ballot Return Blocked	Indicates that the voter's mail ballot has been blocked from being return processed.
Block/Unblock Return	Click **Block Return** to prevent return processing of a voter's mail ballot because they voted at the polls, even though they have mailed the ballot back to the elections office. See Block the Return of a Voter's Mail Ballot for more information. Click **Unblock Return** to reverse the block.
Comments	Use this field to indicate why the change was made, such as why a second ballot was issued or why a voter's return was blocked.
O'seas	This field appears only if the ballot has been returned and the voter is an overseas voter. The possible values are M—Mail, E—Email, and F—Fax. This information is collected for reporting to the U. S. Election Assistance Commission (EAC).
Change Mil/Civ	Toggles the Military/Civilian setting assigned to this request.
Cancel Request	Cancels the Vote-By-Mail Request. The **Request Status** on the **Vote-By-Mail** tab displays *Request Canceled*. Any ballots already issued to the voter remain assigned to this Vote-By-Mail Request. **Note:** If a mail ballot is returned by the postal service as undeliverable to the voter, do not cancel the request. See How to Process an Undeliverable Mail Ballot for instructions.
Audit Report	View the Absentee Audit Report for this Vote-By-Mail Request. Information in the Absentee Audit Report cannot be changed or deleted.
Release Ballot 2nd/3rd Ballot	Records the issuance of a second or third replacement ballot. This button displays the Release Ballot dialog where you record issuance of the ballot.

Reverse Ballot Delivery	Reverses the issuance of a ballot to the voter. You should perform a reverse ballot delivery operation only when a ballot has not yet been mailed or otherwise delivered to the voter. If your county uses ballot numbers, you are asked if you want to delete the ballot number. Click **Yes** if you want to delete the ballot number from the database so it can be reused for another voter; this removes the ballot number from the list of used numbers. Clicking **No** cancels the reverse ballot delivery operation. **Note**: You must be granted the *MailBallotReversal* permission to use this option.
Reverse Return of Ballot	The ballot is no longer marked as voted. **Note**: You must be granted the *MailBallotReversal* permission to use this option.
Reverse Early/In-office Vote	The vote cast during early voting or in-office absentee voting is reversed. **Note**: You must be granted the *MailBallotReversal* permission to use this option.
Reverse Request for 2nd/3rd Ballot	The request for a replacement ballot that has not yet been delivered to the voter is reversed in the Voter Focus system. **Note**: You must be granted the *MailBallotReversal* permission to use this option.
Previous Request	Displays the previous election for which this voter has a Vote-By-Mail Request.
Next Request	Displays the next election for which this voter has a Vote-By-Mail Request.
Close	Closes the dialog and returns you to the **Vote-By-Mail** tab in the voter's record. All changes made on the Mail Ballot dialog are saved to the database.
Maintain Requester Information	Opens the Maintain Requester Information dialog. Use this if a third party requested or picked up a ballot for the voter.
Canvassing Board Reinstatement	Reinstates a mail ballot previously referred by the elections office but reinstated by the Canvassing Board. Reinstated ballots are counted as valid mail ballot returns. Any notices (such as an Absentee Referral Letter or a Signature Affidavit Notice) that were scheduled when the ballot was referred are unscheduled automatically by a reinstatement. See Reinstate a Mail Ballot for more information.

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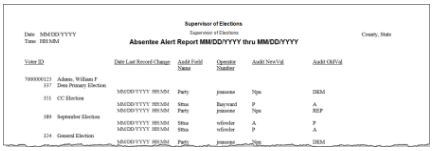
EXHIBIT M:

VR Systems Report: “Absentee Alert Report”

Absentee Alert Report

To run: **REPORTING > Reports > Vote-By-Mail Reports > Vote-By-Mail Voter Lists > Absentee Alert Report**

This report provides voter audit information for any voters who have outstanding Vote-By-Mail requests. It lists changes to voter records, such as a change of residence, mailing, default ballot address, or ballot address for this election, during the time period you specify. This report should be examined to see if any corrective action is required by the Vote-By-Mail coordinator.



Supervisor of Elections

Supervisor of Elections

Date MM/DD/YYYY
Time HH:MM

County, State

Absentee Alert Report MM/DD/YYYY thru MM/DD/YYYY

Voter ID		Date Last Record Change	Audit Field Name	Operator Number	Audit NewVal	Audit OldVal
7000000123	Adams, William F					
107	Dem Primary Election					
		MM/DD/YYYY HH:MM	Party	jonsone	Npa	DEM
101	CC Election					
		MM/DD/YYYY HH:MM	Situs	Barnyard	P	A
		MM/DD/YYYY HH:MM	Party	jonsone	Npa	REP
100	September Election					
		MM/DD/YYYY HH:MM	Situs	wfowler	A	P
		MM/DD/YYYY HH:MM	Situs	wfowler	P	A
124	General Election					
		MM/DD/YYYY HH:MM	Party	jonsone	Npa	DEM

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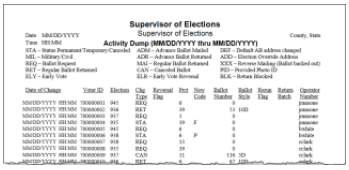
EXHIBIT N:

VR Systems Report: "Absentee Activity Dump"

Absentee Activity Dump

To run: **REPORTING > Reports > Vote-By-Mail Reports > Vote-By-Mail Audit Reports > Absentee Activity Dump**

This report lists the Vote-By-Mail transactions by user with a date. Use this report to track a user's data entry operations. The report contains a shorthand of mail ballot requests entered, delivered, and returned. You have the option of limiting the data to a specified date range.



Supervisor of Elections
Supervisor of Elections
Activity Dump (MM/DD/YYYY thru MM/DD/YYYY)

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EXHIBIT O:

PRINELLAS PROTECED VOTER WEBSITE BLOCK

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Google Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Select Language

Powered by Google Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Last Name:

Siamas

Date of Birth:

[redacted]

House Number of Voter's Residence Address:

[redacted]

Last Four Digits of SSN:

[redacted]

OR

Driver's License (or State ID) Number:

[redacted]

Search

Back

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email:** Election@VotePinellas.gov (mailto:election@votepinellas.gov) | Public Records Request Form (/General-Information/Contact-Us/Public-Record-Request)

P:(727) 464-VOTE (8683) ● F:(727) 464-6239

Election Service Center
13001 Starkey Rd.
Largo, FL 33773
(Starkey Lakes Corporate Center)

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

County Building
501 First Avenue North
St. Petersburg, FL 33701
(Fifth Street North Entrance)

F.S. 668.6076 Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. To submit a public records request, use this form. (/General-Information/Contact-Us/Public-Record-Request)

Absentee Status for All Absentee Voters

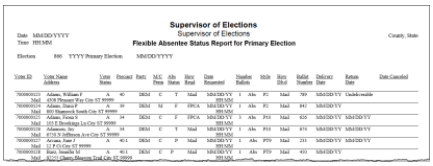
To run a report having the same information as the old Absentee Status for All Absentee Voters report:

1. Go to **REPORTING > Reports > Vote-By-Mail Reports > Vote-By-Mail Voter Lists > Vote-By-Mail Flexible Report**.
2. On the **Vote-By-Mail Flexible Report** dialog, make the following selections:
   - **Output Format** = Status Report
   - **Absentee Status** = All
   - **Location** = All

   To limit the report to a single district within a district type (for example, CC district 1), select from the **District Selection** drop-down list. To run the report for all districts, leave the **District Selection** field blank.
3. Click **OK** to run the report.

The title of the report is now the Flexible Absentee Status Report for *<election name>*.

When run with the above parameters, this report provides a complete list of all Vote-By-Mail requests for the selected election with the dates the request was made, the ballot was delivered/mailed, and the ballot was returned. It includes the ballot style and number of each ballot that the voter has received. The report also includes email addresses for the purposes of sending overseas voters candidate information via email.



Supervisor of Elections
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Flexible Absentee Status Report for Primary Election

This is a long report consuming at least two lines for each voter. An underline separates each voter entry, which on some printers can take a long time to print. If you are interested in a single voter's information, we recommend you instead retrieve the voter's record, go to their Vote-By-Mail Request Status dialog, and click **Audit Report** to create their Absentee Audit Report.

To view a list of other ways to run this flexible report, see Vote-By-Mail Flexible Report.

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EXHIBIT O:

Summary of Affected Judicial Officers and Staff

Exhibit O – Summary of Affected Judicial Officers and Staff

This exhibit lists judges and judicial assistants within the Florida Second District Court of Appeal and the Sixth Judicial Circuit whose vote-by-mail ballots were flagged for unverified submission or were submitted through restricted channels, consistent with the fraud patterns outlined in the accompanying affidavit.

Name	Position	Court	PRI-Ballot Req Date	GEN-Ballot Req Date	Verified ID Status	Protected	Judge Chambers Implicated
Nelly N. Khouzam	Judge/Close Relation	2nd DCA	6/23/2024	9/9/2024	NO/NO	YES	Nelly Khouzam/Morris Silberman
Morris Silberman	Judge/Close Relation	2nd DCA	6/23/2023	9/9/2024	NO/NO	YES	Morris Silberman
Craig C Villanti	Judge	2nd DCA	6/23/2023	9/9/2024	NO/NO	YES	Craig C. Villanti
Gabriella C. Silberman	Close Relation	2nd DCA	6/23/2023	9/9/2024	NO/NO	YES	Morris Silberman/Nelly N. Khouzam
Patricia Muscarella	Circuit Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Patricia Muscarella
Thomas Ramsberger	Judge/Close Relation	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Peter Ramsberger/Thomas Ramsberger
Louise Smith	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Shawn Crane -Chief Judge 6th Circuit
Kim Campbell	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Kim Campbell
Pamela A.M. Campbell	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Pamela A.M. Campbell
Sherwood Coleman	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Sherwood Coleman
Jennifer Dubbeld	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Jennifer Dubbeld
Philip J Federico	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Philip J Federico
Evan Frayman	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Evan Frayman
Brian Gnage	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Brian Gnage
Mary M. Handsel	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Mary M. Handsel
Elizabeth Jack	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Elizabeth Jack
George Jirotka	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	George Jirotka
Doneene Loar	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Doneene Loar
Philippe Matthey	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Philippe Matthey
Patrice Moore	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Patrice Moore
Cynthia J. Newton	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Cynthia J. Newton
Nichole Pearlman	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Nichole Pearlman
Joshua Riba	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Joshua Riba
Pat Siracusa	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Pat Siracusa
James R. Stearns	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	James R. Stearns

See Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009); Williams v. Pennsylvania, 136 S. Ct. 1899 (2016); Fla. R. Gen. Prac. & Jud. Admin. 2.330(d)(1); Canon 3E(1)(a), Fla. Code Jud. Conduct.

Name	Position	Court	PRI-Ballot Req Date	GEN-Ballot Req Date	Verified ID Status	Protected	Judge Chambers Implicated
Susan St. John	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Susan St. John
Kimberly Todd	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Kimberly Todd
Amy M. Williams	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Amy M. Williams
John Carassas	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	John Carassas
Diane Croff	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Diane Croff
Robert Dittmer	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Robert Dittmer
Holly Grissinger	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Holly Grissinger
Edwin Jagger	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Edwin Jagger
James Pierce	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	James Pierce
Lauralee G. Westine	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Lauralee G. Westine
Debi McCarty	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	Daniel D. Diskey
Stacy Wisman	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	David Ellis
Jill Psenisky	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	Philip J Federico
Bonnie Whitehall	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	George Jirotka
Valerie McGivern	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	Thomas Ramsberger
Melinda Vincent	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	Steve Berlin
Annie Nguyen	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Joseph A.Bulone
Jess Rayburn	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Julie L. Sercus
Amber Demiduk	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	John Carassas
Veronica Jupiter	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Diane Croff
Lisa Schultz	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Frank Grey
Tracy Curley	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Kathleen T. Hessinger
Michelle Hall	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Edwin Jagger
JoAn Caffentzis	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Lorraine Kelly
Vicki Masterson	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Theodora C Komninos
Cheryl Nierengarten	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Cathy McKyton
Darleta Burris	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	James Pierce
Pamela Gariepy	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Joseph Poblick
Kim Haumann	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Brett Szematowicz
John D Couriel	Judge	Supreme			NO/NO	YES	John D Couriel

See Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009); Williams v. Pennsylvania, 136 S. Ct. 1899 (2016); Fla. R. Gen. Prac. & Jud. Admin. 2.330(d)(1); Canon 3E(1)(a), Fla. Code Jud. Conduct.

Each entry is based on data sourced directly from the Florida Department of State's *Vote By Mail Early Voting Reports* and the Florida Voter Registration System (FVRS), as cited in Exhibit B and corroborated in Exhibits H and N.

Judicial assistants are confidential agents of the judge and have access to chambers communications, calendar settings, and sensitive court operations. If a judicial assistant is the victim of targeted vote-by-mail fraud related to an ongoing appeal, the judge is likely to be a material witness or possess personal knowledge of disputed facts. As such, disqualification of the judge is mandatory under Rule 2.330(d)(1) and Canon 3E(1)(a), even if the judge's own voter record is not directly implicated. Failure to grant disqualification under these circumstances not only violates ethical and procedural mandates, but also exacerbates the structural error inherent in this case, undermining the constitutional integrity of the tribunal.

EXHIBIT P:

PRINELLAS PROTECED VOTER WEBSITE BLOCK

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Google Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Select Language

Powered by Google Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Last Name:

Siamas

Date of Birth:

[redacted]

House Number of Voter's Residence Address:

[redacted]

Last Four Digits of SSN:

[redacted]

OR

Driver's License (or State ID) Number:

[redacted]

Search

Back

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email:** Election@VotePinellas.gov (mailto:election@votepinellas.gov) | Public Records Request Form (/General-Information/Contact-Us/Public-Record-Request)

P:(727) 464-VOTE (8683) ● F:(727) 464-6239

Election Service Center
13001 Starkey Rd.
Largo, FL 33773
(Starkey Lakes Corporate Center)

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

County Building
501 First Avenue North
St. Petersburg, FL 33701
(Fifth Street North Entrance)

F.S. 668.6076 Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. To submit a public records request, use this form. (/General-Information/Contact-Us/Public-Record-Request)

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Robin Devine, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

12760 Indian Rocks Rd Unit 571 Largo FL 33774

2. On approx 8/10/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 14, ____, 2024.

Robin L Devine
Signature

Robin L. Devine
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 14th
day of August, 2024, by Robin L. DeVine.

Christine Peters
(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned
Name of Notary Public)

Personally Known ☐OR
Produced Identification ☐

[redacted]
Type of Identification Produced

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I, [Your Full Name] Robert A. Ferri, being duly sworn, depose and say:

1. Personal Information:

- I am a resident of Pinellas County, Florida.
- My current address is [Your Full Address] 7602 Ridge Rd. Seminole FL 33772.
- My date of birth is [Your Date of Birth] 08/12/1956.

2. Statement of Facts:

- On [Date You Received the Ballot] 06/23/24, I received a vote-by-mail ballot at my residence.
- I did not request a vote-by-mail ballot for the 2024 Primary Election on 06/23/2024.
- I have not authorized anyone to request a vote-by-mail ballot on my behalf on 06/23/2024.
- I have confirmed with that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.
- I did not sign a DS-DE 160 Form requesting a Vote-By-Mail Ballot a copy of attached.

3. Conclusion:

- To the best of my knowledge, this vote-by-mail ballot was sent to me without my request or authorization.
- I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on [Date] 8/14/24 at Clearwater, FL. [City, State].

[Your Full Name] Robert A. Ferri

[Your Signature] Robert A Ferri

NOTARY ACKNOWLEDGMENT

STATE OF FLORIDA

COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me by means of ✓ physical presence or ___ online notarization, this 14th day of August, 2024, by [Your Full Name].

Christine Peters

(Signature of Notary Public)

Christine Peters

(Name of Notary, typed, printed, or stamped)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ___ OR Produced Identification ✓

Type of Identification Produced: DL [redacted]

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____ / ____ / ____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☒ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** ____ / ____ / ____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** ____ / ____ / ____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, CATHI CHAMBERLAIN, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

10520 SAN FERNANDO BLVD NE; ST. PETERSBURG, FL 33702

2. On 7-18-2024, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on AUGUST, 17, 2024.

Signature

CATHI CHAMBERLAIN

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 17th
day of August, 2024, by Cathi Chamberlain.

Christine Peters

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Christine Peters

(Print, Type, or Stamp Commissioned
Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

AFFIDAVIT

(Amendment to AFFIDAVIT Signed Aug. 17, 2024)

STATE OF FLORIDA

COUNTY OF PINELLAS

I, Cathi Chamberlain, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is: 10520 San Fernando Boulevard, NE; St. Petersburg, FL 33702.
2. I am adding documents related to my Affidavit signed on August 17, 2024 (ATTACHMENT A)
3. "5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election." (ATTACHMENT B and C)
4. "6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot." (ATTACHMENTS B and D)
5. The Pinellas Supervisor of Elections (SOE) and I both agree I did not request a Vote by Mail Ballot on June 23, 2024, yet when I researched my name on the SOE Website, a side portal seemingly shows that I did. (ATTACHMENTS B and E).
6. I am concerned about the integrity of my voter registration information even more at this point than I was when I submitted my previous affidavit signed on August 17th, 2024 (Attachment A) and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on 27th of August, 2024.

Cathi Chamberlain

Signature

Cathi Chamberlain

Full Name

STATE OF FLORIDA
COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me by means of ✓ physical presence or ___ online notarization, this 27th day of August, 2024, by Cathi Chamberlain. Type of Identification Produced: personally known

Christine Peters

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 486653
Expires February 25, 2028

Commissioned Name of Notary Public

ATTACHMENT A

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, [redacted] am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

[redacted]

2. On 7-15-24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024 which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6 I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 17, 2024.

Signature

Cathi Chamberlain

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 17th day of August, 2024, by Cathi Chamberlain.

CHRISTINE PETERS
Commission # HH 456853
Expires February 28, 2028

(Signature of Notary Public Florida)

Christine Peters

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

ATTACHMENT B

FW: public records request

Chase, Dustin <dchase@votepinellas.gov>

Thu 8/15/2024 11:59 AM

To:Rules for Deplorables <cathi@rulesfordeplorablesbook.com>
Cc:Chase, Dustin <dchase@votepinellas.gov>;Smith, Matt <masmith@votepinellas.gov>;McKnight-Taylor, Ashley <ataylor@votepinellas.gov>

Dear Cathi,

It was nice to talk to you today.

The information you've requested is confidential and exempt from disclosure under Florida law (see Section 101.62(2), Florida Statutes). Granted, there is an exception for the voter themselves. Typically, we require the voter to visit our office and present identification to obtain this information. In your case, we are making an exception because we know you, you confirmed with us you sent the email and you verified the last four of your social security number with me.

You mentioned you believe you requested your mail ballot on June 23, 2024. Our records indicate you actually requested it last year on May 19, 2023, at 4:41 p.m. This aligns with the fact that we sent you a mail ballot for the Presidential Preference Primary, which was not returned as undeliverable or voted. Our records also show you voted in person at your polling place on March 19.

Regarding the DS-DE 160 form, The Florida Division of Elections did not finalize the form until nearly a year after you submitted your request. The law does not require all voters requesting mail ballots to file a DS-DE 160: only voters requesting a mail ballot in writing. Since you requested your mail ballot online using your driver license number, there is no DS-DE 160 on file for you. Thereby, we have no records responsive to your request.

We hope that you will help to clarify this process and dispel any misinformation.

Sincerely,

Dustin Chase, Deputy Supervisor of Elections
Representing Julie Marcus, Pinellas County Supervisor of Elections
13001 Starkey Rd., Largo, FL 33773
Phone: (727) 464-4988
Fax: (727) 464-6239
dchase@votepinellas.gov
Follow us @VotePinellas
Like us on Facebook

Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. -- F.S. 668.6076

Conforme a la legislación de Florida, las direcciones de correo electrónico son registros públicos. Si no desea que su correo electrónico se divulgue como respuesta a una solicitud de registros públicos, no envíe un correo electrónico a esta entidad. En su lugar, póngase en contacto con esta oficina por teléfono o por escrito. -- F.S. 668.6076

From: Rules for Deplorables <cathi@rulesfordeplorablesbook.com>
Sent: Tuesday, August 13, 2024 7:34 PM
To: Mail, Election <election@votepinellas.gov>; Chase, Dustin <dchase@votepinellas.gov>; Marcus, Julie <jmarcus@votepinellas.gov>
Subject: public records request

AMENDMENT C

Form Name: View Web Absentee Request
Captured: 8/26/2024 8:48:51

View Web Absentee Request

Print Console Voters Help Exit

Print 107052957 CATHI CHAMBERLAIN 10525 SAN FERNANDO BLVD NE
Mailing Address 1 Mailing Address 2 City State Zip Country

Voter Classification Civilian, Domestic
Email Address cathichamberlain2022@gmail.com
Phone Number 7273207716 Submitted Date: May/15/2023 DLN# [redacted] Last4SSN# [redacted]

Absentee Ballot Address
Line 1
Line 2
Line 3
City
State Zip
Country
Fax

Requester Information
First Name
Last Name
Address
Relationship
DLN#
Last4SSN# [redacted]

Voter provided UOCAVA Address
Remarks

Requested Delivery Mail

VR Systems Voter Focus

AMENDMENT D

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____ / ____ / _____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____ / _____ / _____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____ / _____ / _____
The voter directly instructed me to make this request for them.

AMENDMENT E

Complete the form to:

- Check the status of your mail ballot
- View where to vote on Election Day
- View sample ballots
- See upcoming elections
- Review update your voter registration information
- Review your voting activity for the past 12 months

2024 Primary Election

Voter Status: You are scheduled to receive a mail ballot for this election.

View Sample Ballot

Your Mail Ballot Information

Ballot 1 Status

1 REQUESTED > 2 SENT > 3 RECEIVED > 4 COUNTED

Ballot 1 Requested by Voter

Date Requested: Sunday, June 23, 2024

Ballot Destination:

10530 SAN FERNANDO BLVD NE
ST PETERSBURG, FL 33702

Election Day Polling Location:

Epiphany Ukrainian Catholic Church
4331 9th Ave N
St Petersburg, FL 33703

View Early Voting Locations

Important Dates

Election Day: Tuesday, August 20, 2024
Registration Closes: Monday, July 22, 2024
Early Voting Begins: Saturday, August 10, 2024
Early Voting Ends: Sunday, August 18, 2024

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I, [Your Full Name] Robert A. Ferri, being duly sworn, depose and say:

1. Personal Information:

- I am a resident of Pinellas County, Florida.
- My current address is [Your Full Address] 7602 Ridge Rd. Seminole FL 33772.
- My date of birth is [Your Date of Birth] 08/12/1956.

2. Statement of Facts:

- On [Date You Received the Ballot] 06/23/24, I received a vote-by-mail ballot at my residence.

- I did not request a vote-by-mail ballot for the 2024 Primary Election on 06/23/2024.

- I have not authorized anyone to request a vote-by-mail ballot on my behalf on 06/23/2024.

- I have confirmed with that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

- I did not sign a DS-DE 160 Form requesting a Vote-By-Mail Ballot a copy of attached.

3. Conclusion:

- To the best of my knowledge, this vote-by-mail ballot was sent to me without my request or authorization.

- I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on [Date] 8/14/24 at Clearwater, FL. [City, State].

[Your Full Name] Robert A. Ferri

[Your Signature] Robert A Ferri

NOTARY ACKNOWLEDGMENT

STATE OF FLORIDA

COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me by means of ✓ physical presence or ___ online notarization, this 14th day of August, 2024, by [Your Full Name].

Christine Peters

(Signature of Notary Public)

Christine Peters

(Name of Notary, typed, printed, or stamped)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ___ OR Produced Identification ✓

Type of Identification Produced: DL [redacted]

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____ / ____ / ____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☒ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____ / _____ / _____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____ / _____ / _____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Robin Devine, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

12760 Indian Rocks Rd Unit 571 Largo FL 33774

2. On approx 8/10/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 14, ____, 2024.

Robin L Devine
Signature

Robin L. Devine
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 14th day of August, 2024, by Robin L. DeVine.

Christine Peters
(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☐OR
Produced Identification ☐

D [redacted]
Type of Identification Produced

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Valerie Schoeman, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is: 2533 Skipper Trl, Clearwater, FL 33761.

2. On or about July 16th, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 26th, 2024.

Signature

Valerie Ann Schoeman

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 26th
day of August, 2024, by Valerie Ann Schoeman.

(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2026

Personally Known ☐OR
Produced Identification ☑

FL-DL [redacted]

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot:
(only if different than home address)

_____ **City:** _____

State: _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** ____/____/____
The voter directly instructed me to make this request for them.

DS-DE 160 (eff. 04/17/2024

Rule 1S-2.055, F.A.C.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Nikki Schoeman, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

2533 Skipper Trl, Clearwater, FL 33761.

2. On or about July 16th, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 26th, 2024.

Nikki Schoeman
Signature

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 26th
day of August, 2024, by Nikki Schoeman.

Christine Peters
(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☐ OR
Produced Identification ☑

FL DL [redacted]
Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____ / ____ / ____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot:

(only if different than home address)

_____ **City:** _____

State: _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____ / _____ / _____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____ / _____ / _____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Vernon C. Verigan, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

10630 - 95 ST. N, SEMINOLE, FL 33777.

2. On OR ABOUT 7-16-24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on AUGUST, 26, 2024.

Signature

VERNON CLARE VERIGAN

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 26th day of August, 2024, by Vernon Verigan.

(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☐OR
Produced Identification ☑

FL-DL [redacted]

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62 F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

DS-DE 160 (eff. 04/17/2024

Rule 1S-2.055, F.A.C.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Nancy Verigan, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

10630-95th St. N. Seminole, FL 33777.

2. On or about July 16th, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on July, 26, 2024.

Nancy Ann Verigan
Signature

Nancy Ann Verigan
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 26th
day of August, 2024, by Nancy Ann Verigan.

Christine Peters
(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

NOTARY PUBLIC STATE OF FLORIDA
CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☐ OR
Produced Identification ☑

FL-DL [redacted]
Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62 F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot:
(only if different than home address)

_____ **City:** _____

State: _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

DS-DE 160 (eff. 04/17/2024

Rule 1S-2.055, F.A.C.

Gmail

Christopher Gleason <gleasonforpinellas@gmail.com

24-3717CI

UBLIC RECORDS REQUEST- VOTE BY MAIL BALLOT REQUESTS

hristopher Gleason <gleasonforpinellas@gmail.com> Wed, Jul 17, 2024 at 12:05 F
: Matt <masmith@votepinellas.gov>, Dustin Chase <dchase@votepinellas.gov>, OECS@dos.myflorida.com, publicrecordsrequest ublicrecordsrequest@votepinellas.gov>, Maria.Matthews@dos.myflorida.com, "Byrd, Cord" <cord.byrd@dos.myflorida.com>
[redacted]

FILED
ST. PETERSBURG BRANCH
CLERK OF CIRCUIT COURT
2024 AUG 20 PM 2:34

Dear Custodian of Records,

I am writing to submit an open records request under the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes seeking access to public records, Florida State Election Records, and Federal Election Records related to the following:

- Copies of any and all Logs, List(s) and/or documents of the Pinellas County Voters who have requested a Vote by Mail Ballot be mailed to them for the August 20th Primary Election

I am requesting these public records in the electronic file format .PDF.

I understand that some of this information may already be publicly available, but I are seeking the official and comprehensive records directly from the county's election authorities to ensure accuracy and completeness.

Please consider this letter as a formal request for disclosure under the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes.

Please provide these records in a format that is consistent with the requirements of the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes If possible, We request that the records be provided electronically, via email or a secure file-sharing platform.

If portions of the requested records are exempt from disclosure under the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes, please provide us with a written explanation of the specific legal basis for any redactions or withholdings.

We request that this public records request be processed promptly and in accordance with the statutory timelines for response and production of records under the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes.

I hereby certify that I will not:

(A) Use any list of name(s) or addresses contained in or derived from the records or information for the purpose of selling or offering for sale any property or service to any person listed or to any person who resides at any address listed

(B) Sell, give, or otherwise make available to any person any list of name(s) or addresses contained in or derived from the records or information for the purpose of allowing that person to sell or offer for sale any property or service to any person listed or to any person who resides at any address listed.

As per Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes, we expect a prompt response to this request. If, for any reason, you cannot comply with this request within the specified timeframe, please provide a written explanation for the delay and indicate when we can expect the records to be made available.

Please take appropriate steps to ensure that records responsive to this request are not deleted by your office before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records. To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner and that extraneous costs are not incurred.

By working together at the outset, The Justice Society and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in electronic format by email or via a shared online drive.

Warmest Regards,

Christopher Gleason

Candidate for Supervisor of Elections Pinellas County, Florida

Gmail

Christopher Gleason <gleasonforpinellas@gmail.com

UBLIC RECORDS REQUEST- VOTE BY MAIL BALLOT REQUESTS

hase, Dustin <dchase@votepinellas.gov> Thu, Jul 25, 2024 at 4:01 P
: "GleasonforPinellas@gmail.com" <gleasonforpinellas@gmail.com>, [redacted]
: publicrecordsrequest <publicrecordsrequest@votepinellas.gov>

Dear Mr. Gleason,

As a candidate with opposition, you are entitled to the list of mail ballot requests after filing your oath of acquisition.

Additionally, please be advised that fulfilling your request as stated would require an estimated 18,000 hours to compile the logs and documents for each voter who requested a mail ballot. Given this substantial time requirement, there will be significant costs associated with the retrieval, review, and redaction of these records.

Under Florida law, we are permitted to charge a special service fee for the extensive use of information technology resources and/or clerical or supervisory assistance required to process your request. The estimated cost for fulfilling your request will be provided upon determining the exact scope and volume of records responsive to your request. Please note that these costs are based on actual labor and resources incurred by the Supervisor of Elections Office.

We are prepared to work with you to narrow the scope of your request to make it more manageable and cost-effective. For instance, if there are specific types of logs or subsets of information you are most interested in, please let us know so we can focus our efforts accordingly.

Furthermore, please be informed that any exempt or confidential information will be redacted in accordance with the applicable Florida Statutes.

To proceed, we invite you to either narrow the scope of your request to reduce the estimated time and resources required, or we can provide a full cost estimate for processing the entire request as currently stated. Please let us know your preference and any specific subsets of the requested information you are requesting. If a response is not received within 30 days of this correspondence, we will consider the request closed.

Sincerely,

Dustin Chase, Deputy Supervisor of Elections

Representing Julie Marcus, Pinellas County Supervisor of Elections

13001 Starkey Rd., Largo, FL 33773

Phone: (727) 464-4988

Fax: (727) 464-6239

dchase@votepinellas.gov

Follow us @VotePinellas

Like us on Facebook

Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. – F.S. 668.6076

24-3717C I

FILED
ST. PETERSBURG BRANCH
2024 AUG 20 PM 2:34
KEN BURKE
CLERK OF CIRCUIT COURT

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, JAMES M. BROWN JR, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

100 BLUFF VIEW DR. APT 211A BELLEAIR BLUFFS FL 33770

2. On OR ABOUT JULY 16, 2024, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 19, 2024.

James M. Brown JR
Signature

JAMES M. BROWN JR
Full Name

STATE OF FLORIDA
COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 19th day of August, 2024, by James M. Brown Jr.

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Christine Peters
(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Ann Whisler, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:
99 Dolphin DR N. Oldsmar, FL 34677.

2. On or about 7/6/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 16, ____, 2024.

Ann Whisher
Signature

Ann Whisher
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 16 day of August, 2024, by Ann Whisher.

Christine Peters
(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496853
Expires February 26, 2028

Christine Peters
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Kathleen A. Shanks, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

2755 Curlew Rd Lot 76 Palm Harbor, FL 34684.

2. On or about July 16, 24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on 08-27, ____, 2024.

Kathleen A Shanks
Signature

Kathleen A. Shanks
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 27th
day of August, 2024, by Kathleen A. Shanks.

Christine Peters
(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Print, Type, or Stamp Commissioned
Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ Date: ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

☐ Spouse
☐ Parent
☐ Child
☐ Grandparent
☐ Grandchild
☐ Sibling
☐ Parent of voter's spouse
☐ Child of voter's spouse
☐ Grandparent of voter's spouse
☐ Grandchild of voter's spouse
☐ Sibling of voter's spouse
☐ Voter's legal guardian
☐ Designee for a voter with a disability

Designee's Signature: _____ Date: ____/____/____
The voter directly instructed me to make this request for them.

DS-DE 160 (eff. 04/17/2024

Rule 1S-2.055, F.A.C.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Karol Kay Pravda, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is: 1500 Edna Ave. NW, Largo, FL. 33770.

2. On about July 16, 2024 I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 27, 2024.

Karol Kay Pravda
Signature

Karol Kay Pravda
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 27th
day of August, 2024, by Karol Kay Pravda.

Christine Peters
(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ mailing address in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** ____/____/____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, THOMAS ROMANO, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

5313 18th ST. NE. ST. PTE FL 33703.

2. On OR ABOUT July 16th, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 27, 2024.

Signature

THOMAS G. ROMANO
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 27th day of August, 2024, by Thomas Romano.

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☒ AP

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ Date: ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ Date: ____/____/____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Rhonda Romano, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

5313 18th St. NE.

2. On or about July 6, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 27, 2024.

Rhonda Romano
Signature

Rhonda Romano
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 27th
day of August, 2024, by Rhonda Romano.

Christine Peters
(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ Date: ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ Date: ____/____/____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, MAUREEN ZILLES, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

8392 Meadowbrook Dr East, Largo, FL 33777.

2. On or about 7/25/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 28, 2024.

Signature

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 28th day of August, 2024, by Maureen Zilles.

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, LouAnn M. Rice on Behalf of Simone M Rice (mother) Now Deceased, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

1209 E. Boyer St., Tarpon Springs, FL 34689.

2. On or about 7/16/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot. → on behalf of my mother

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on Aug 29th, ____, 2024.

Signature on behalf of Simone M. Rice

LouAnn M. Rice
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 29th day of August, 2024, by LouAnn Marie Rice.

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62 F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

LouAnn Rice

1209 E Boyer St.

Tarpon Springs, FL 34689

(also Simone Rice's address)

8/27/2024

Reference:

Simone Marie Rice's Request for a mail in ballot 6/23/2024, as seen on Pinellas County web site.

At age 90 and a few years previous, I helped my mother obtain her mail in vote when she was not capable.

I also drove my mother to the polls to turn in her mail in ballot and vote later when she was capable.

This week I looked back I looked back at files I had because I could not remember re-requesting a mail in ballot this spring as I understand was required if mom wanted to continue to vote by mail.

Initially I mistakenly saw in my files the Vote by mail ballot envelope I copied 2/22/2024 and thought that was it but it was actually her return envelope for the 2024 Presidential Primary.

I am sure I would have saved a copy of the website page confirming if I had RE-requested to continue her voting by mail but I have none and know I put it off because I was unsure about my mother's multiple health issues at that point, June 2024.

By June 23rd 2024, the supposed date my mother requested to continue with Mail-In Voting, my mother was on a fast decline.

Simone had been on pain killers and recently anti-depressants both making wading through political conversation impossible and un-important.

My mother was bed ridden since her last operation, had no computer and was incapable of using her smart phone to navigate to any website.

I swear, because of her state of health, there is **No Way** I requested a Mail in ballot for my mother on June 23rd , 2024.

I knew she would not last much longer and unfortunately was proven to be correct as she passed away 16 days later.

I still have the unopened mailed ballot received shortly before she passed.

I do not see any Postal Stamped Date indicating when it was mailed.

LouAnn M Rice

JULIE MARCUS
SUPERVISOR OF ELECTIONS
PINELLAS COUNTY
13001 Starkey Rd., Largo FL 33773-1416

OFFICIAL ELECTION MAIL
Authorized by the U.S. Postal Service

NON PROFIT ORG
US POSTAGE
PAID
ST. PETERSBURG, FL
PERMIT #4020

OFFICIAL BALLOTING MATERIAL
FIRST-CLASS MAIL

DO NOT FORWARD

SIMONE M RICE

1209 E BOYER ST TARPON SPRINGS FL 34689

84270000150

9114 5112 5703 1408 1427 2547

G113

SIMONE M RICE
1209 E BOYER ST
TARPON SPRINGS FL 34689

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Nancy Skinner-Eriksson, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

1449 Ridge Shore Dr Tarpon Spngs Fl 34689

2. On or about 7-16-24 I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 29, 2024.

Nancy Skinner-Ericsson
Signature

Nancy Skinner-Ericsson
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 29th
day of August, 2024, by Nancy Skinner-Ericsson

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Christine Peters
(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned
Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Christina M. Ott, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

3300 Fox Chase Cir #216 Palm Harbor FL 34683

2. On July 16 2024, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on Aug 27, 27, 2024.

Signature

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 27th day of August, 2024, by Christina Ott.

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot:
(only if different than home address)

_____ **City:** _____

State: _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Marianne Segal, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

2416 World Parkway Blvd #14 Clearwater, FL. 33763

2. On July 16, 2024, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on Aug 24, 24, 2024.

Signature

Marianne Segal
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 24th day of August, 2024, by Marianne Segal.

(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

Filing # 221001287 E-Filed 04/15/2025 02:48:37 AM

IN THE DISTRICT COURT OF APPEAL OF FLORIDA, SECOND DISTRICT

Case No.: 2D2024-2687

CHRISTOPHER GLEASON
Appellant/Petitioner, Pro Se,
vs.
JULIE MARCUS, et al.
Appellees/Respondents.

MOTION TO DISQUALIFY JUDGE MORRIS SILBERMAN

COMES NOW, Appellant, Christopher Gleason, pro se, and moves to disqualify Judge Morris Silberman from presiding over this appeal pursuant to Rule 2.330, Florida Rules of General Practice and Judicial Administration, the Florida Code of Judicial Conduct (Canon 3E), Florida Statutes §§ 38.02 and 38.10, and Article I, Section 21 of the Florida Constitution, and states the following:

I. GROUNDS FOR DISQUALIFICATION

1. Judge Morris Silberman appears in the Florida Division of Elections Vote-By-Mail Early Voting Reports as having submitted vote-by-mail (VBM) ballot requests that lacked verified ID in violation of election security requirements. These facts are documented in Exhibit B.

2. Judge Silberman is married to Judge Nelly Khouzam, who is also listed in the same VBM reports. Their joint presence in these reports makes them both fact witnesses and potential victims in a scheme involving criminal misuse of confidential voter information for protected judicial officers, in violation of Fla. Stat. § 97.0585.

3. Exhibits C through I provide indisputable evidence that requests for VBM ballots were submitted on unauthorized dates (e.g., Sunday, June 23, 2024), using systems (Voter Focus/VR Systems) that require identity authentication which was not met in these cases.

4. Judge Silberman's name appears in Exhibit O, a summary of 56+ judicial officers and their staff affected by the unauthorized VBM activity. His inclusion as both an affected individual and spouse of another implicated judge (Khouzam) necessitates recusal under Rule 2.330(d)(1) and Canon 3E(1)(a).

5. Exhibit I, the affidavit of John Siamas, confirms the chain of custody and authenticity of the VBM data obtained through the Florida Division of Elections secure portal. This affidavit substantiates that the records identifying Judge Silberman are genuine and unaltered.

6. VR Systems Manuals (Exhibits D, E, F, I) establish that any VBM activity without verified identification or outside business hours violates normal procedure and does not generate a valid audit trail. These facts support the contention that Judge Silberman was a targeted victim of election fraud, placing him in a direct evidentiary position.

7. Under Rule 2.330(d)(1), a judge shall be disqualified if they have "personal knowledge of disputed evidentiary facts." As an affected voter whose VBM record was manipulated, Judge Silberman has direct personal knowledge relevant to this appeal.

8. Under Canon 3E(1)(a) of the Florida Code of Judicial Conduct, a judge must disqualify themselves where they are likely to be a material witness. Due to his unique position as both a judicial officer and affected party, Judge Silberman is likely to be a material witness regarding the nature and scope of the VBM fraud.

9. This motion is filed timely under Rule 2.330(e), within 30 days of the public disclosure of Judge Silberman’s inclusion in the VBM audit report on April 11, 2025.

10. Under Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), the U.S. Supreme Court recognized that disqualification is required where the circumstances present a serious risk of actual bias. Such risk is present here.

11. Further compounding the conflict, Judge Silberman's daughter, Gabriella C. Silberman, is also listed among the protected voters whose vote-by-mail ballots were illegally requested, as documented in Exhibit O. This expands the scope of personal involvement and raises the probability that Judge Silberman possesses personal knowledge of disputed evidentiary facts. It also substantially reinforces the appearance of partiality and mandates recusal under Canon 3E(1)(a) and Rule 2.330(d)(1).

12. The continued participation of Judge Silberman in this case, despite his direct and familial involvement in the underlying fraud allegations, constitutes a structural error under both Florida and federal constitutional jurisprudence. As established in *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009), and *Tumey v. Ohio*, 273 U.S. 510 (1927), due process is violated when a judge's interest creates a serious risk of actual bias. Because this error infects the entire appellate process, it cannot be deemed harmless and would require automatic reversal of any resulting decision.

13. The evidence makes clear that this is not a theoretical concern. It is a legally documented breakdown in the integrity of the vote-by-mail process that directly affects the composition of the reviewing tribunal. When a judge fails to recuse under circumstances where their impartiality may reasonably be questioned—and where they are a material witness or victim of the very conduct under appellate review—the resulting proceedings are fundamentally unfair. Such non-recusal constitutes a violation of due process under the Fourteenth Amendment, as reaffirmed in Tumey v. Ohio, 273 U.S. 510 (1927), where the U.S. Supreme Court held that even a potential conflict of interest on the part of a judge violates due process, and in In re Murchison, 349 U.S. 133 (1955), where the Court emphasized that 'no man can be a judge in his own case' and condemned proceedings that carry even the appearance of partiality. Disqualification and vacatur are therefore constitutionally required, as no harmless error review can cure this defect.

II. PRAYER FOR RELIEF

WHEREFORE, the undersigned respectfully requests that Judge Morris Silberman be disqualified from participating in any proceedings, decisions, or deliberations in the above-captioned matter.

Respectfully submitted,
/s/ Christopher Gleason
Christopher Gleason
2098 Seminole Blvd, #6212
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com, gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I certify that a true copy of this motion was furnished via the E-Filing Portal and U.S. Mail on April 14, 2025, to:

- Clerk of the Second District Court of Appeal
- Clerk of the Circuit Court for the Sixth Judicial Circuit, Pinellas County
- The Honorable Judge Morris Silberman, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- Jared N. Kahn, Esq., Attorney for Appellee Julie Marcus (jkahn@pinellas.gov)
- Kelly L. Vicari, Esq., Attorney for Appellee Julie Marcus (kvicari@pinellas.gov)
- Jeffrey N. Klein, Esq. – Attorney for Appellee Pinellas County Canvassing Board (jklein@pinellas.gov) (eservice@pinellas.gov)

/s/ Christopher Gleason

Christopher Gleason
2098 Seminole Blvd, #6212
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com, gleasonforpinellas@gmail.com

CERTIFICATE OF COMPLIANCE

This motion complies with Rule 9.045(e), using 14-point Times New Roman font.

/s/ Christopher Gleason

Christopher Gleason
2098 Seminole Blvd, #6212
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com, gleasonforpinellas@gmail.com

EXHIBITS

Exhibit A – Affidavit of Christopher Gleason (April 1**1**, 2025)

Exhibit B – Florida Department of State "Vote By Mail Early Voting Reports" (Redacted)

Exhibit C – Screenshot and Calendar Showing June 23, 2024 (Sunday) from votepinellas.gov

Exhibit D – VR Systems: "Dialog: Process Web Vote-By-Mail Requests" (Protected Voter Display)

Exhibit E – VR Systems: "About Data Files Sent to FVRS by Voter Focus"

Exhibit F – VR Systems: "How to Process Received Mail Ballot Requests"

Exhibit G – Second District Court of Appeal Judge Roster (screenshot from 2dca.flcourts.gov)

Exhibit H – Affidavit of John Siamas (April 7, 2025)

Exhibit I – VR Systems Manual: “Dialog: Vote-By-Mail Request”

Exhibit J – VR Systems Manual: “About Capturing Questionable Vote-By-Mail Requests from the Web”

Exhibit K – VR Systems Report: “Questionable Web Requests for an Election”

Exhibit L – VR Systems Dialog: “Mail-Ballot Adjustments”

Exhibit M – VR Systems Report: “Absentee Alert Report”

Exhibit N – VR Systems Report: “Absentee Activity Dump”

Exhibit O - Summary of Affected Judicial Officers and Staff

Exhibit P – Pinellas Protected Voter Block

Exhibit Q – Voter Affidavits

EXHIBIT A:

Christopher Gleason Affidavit April 11, 2024

IN THE DISTRICT COURT OF APPEAL OF FLORIDA, SECOND DISTRICT

Case No.: 2D2024-2687

Case No.: 2D2024-2688

Christopher Gleason
Appellant/Petitioner, Pro Se,

v.

Julie Marcus, et al.
Appellees/Respondents.

AFFIDAVIT OF CHRISTOPHER GLEASON IN SUPPORT OF MOTION TO DISQUALIFY JUDGE NELLY N. KHOUZAM

STATE OF FLORIDA
COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Christopher Gleason, who, being duly sworn, deposes and says:

1. I am the Appellant/Petitioner in the above-captioned matter and make this affidavit in support of my Motion to Disqualify Judge Nelly N. Khouzam.

2. I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and belief.

3. I obtained the official election records from the Florida Department of State, Division of Elections titled *Vote By Mail Early Voting Reports* (Exhibit B), from the Florida State Secretary of State Division of Elections website at the

following secure download URL: (https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports). These public records/ election records showed that vote-by-mail requests were submitted in the name of Judge Nelly N. Khouzam on June 23, 2024, and again on September 9, 2024.

4. Judge Khouzam is a protected voter under Florida Statutes § 97.0585, meaning her voter information is confidential and cannot be accessed or used for vote-by-mail ballot requests without verified identity and legal authorization.

5. These vote-by-mail requests were flagged as "N" (no verified ID) in the Florida Voter Registration System (FVRS), confirming they were submitted without the legally required authentication.

6. The June 23, 2024, request was made on a Sunday, a day on which the Pinellas County Supervisor of Elections office was closed (Exhibit C), making in-person or phone requests legally impossible. Moreover, Exhibit I (VR Systems Manual: Vote-By-Mail Request Dialog) confirms that protected voters cannot submit online requests without manual override by staff with elevated credentials.

7. VR Systems' internal user manual (Exhibit I) explains that protected voter profiles—such as Judge Khouzam's—trigger automatic flags that prevent any online vote-by-mail request submission. These records can only be modified through elevated access credentials by elections staff. Furthermore, as outlined in Exhibit E and F, Voter Focus software requires manual identity verification and restricts processing of such requests to specific user roles with administrative clearance. Exhibit I (VR Systems Manual: Vote-By-Mail Request Dialog) explicitly states that protected voter profiles, per F.S. § 97.0585, are blocked from online VBM submissions to prevent unauthorized access. Any request requires manual entry by staff with elevated credentials, logged with user ID and timestamp (Exhibit N). Thus, the June 23, 2024, request for Judge Khouzam, and 219,673 others including protected voters, is legally impossible absent unauthorized override.

8. According to Rule 1S-2.055(3)(d), a valid vote-by-mail request remains active through December 31, 2026. Thus, the September 9, 2024, request was not only unverified but also redundant and indicative of a procedural breach or unauthorized override.
9. Rule 1S-2.043(2)(a) of the Florida Administrative Code requires that any vote-by-mail request contain "the name, address, and date of birth of the

voter and the requestor, if different." Such criteria were not met in either of Judge Khouzam's VBM entries, further supporting the conclusion of procedural violation.

10. Exhibit I further describes that each VBM request requires fields for the "Requester Name," "Relationship to Voter," and an auto-generated "Request Date." The absence of valid requester data and the use of blocked channels for a protected voter supports the conclusion that these requests were fraudulent.

11. Additionally, Exhibit N (Absentee Activity Dump) confirms that the Florida Voter Registration System maintains a comprehensive log of all VBM activity, including the user ID, timestamp, and method of submission. These audit logs would pinpoint exactly when and how Judge Khouzam's VBM entries were created or modified—offering forensic confirmation of unauthorized access. I requested Absentee Ballot Request Information logs from the Pinellas County Supervisor of Elections to verify the June 23, 2024, entries (Exhibit N). The Supervisor claimed production would take 19,000 hours, despite VR Systems' automated daily uploads to FVRS (Exhibit E). This refusal violates F.S. § 838.022 and F.S. § 119.07 and suggests concealment of evidence confirming fraudulent entries, including Judge Khouzam's, warranting an adverse inference that logs would reveal

unauthorized access. F.S. § 119.11 requests filed, Supervisor of Elections 19,000 hours claim is baseless (Times Publ'g Co.).

12. Based on additional information provided by John Siamas (Exhibit H), a 2024 Florida Senate candidate, this case forms part of a larger pattern of vote-by-mail fraud affecting over 56 judicial officers, including Judge Khouzam and multiple members of this appellate court. John Siamas (Exhibit H) identified 219,673 unverified VBM requests on June 23, 2024, from Pinellas County, comprising 99% of statewide requests, with 219,628 lacking ID verification (Exhibit B). Over 56 judicial officers, including protected voters like Judge Khouzam, were targeted, violating F.S. § 97.0585. This unprecedented spike, on a Sunday when no verification was possible (Exhibit C), indicates a coordinated scheme compromising the Second DCA and Sixth Circuit's impartiality. The 219,673 requests on June 23, 2024, a Sunday, represent a statistically impossibility for legitimate voter activity, particularly for protected voters barred from online submissions (Exhibit I), confirming fraudulent intent. I obtained signed affidavits from 18 voters, attesting they did not request VBM ballots on June 23, 2024, yet received them (Exhibit Q). These confirm unauthorized FVRS entries, mirroring Judge Khouzam's unverified request (Exhibit B) and John

Siamas's data of 219,673 illegal requests (Exhibit H). As protected voters are blocked from online submissions (Exhibit I), these ballots violate F.S. § 97.0585, F.S. § 101.62, F.S. 104.0616, evidencing a fraudulent scheme compromising judicial impartiality. League of Women Voters v. Detzner, 172 So. 3d 363 (Fla. 2015), condemns election concealment. The 219,673 unverified requests (Exhibit B), Judge Dubbeld's non-consent (¶18), 18 affidavits (Exhibit P), and 19,000-hour log delay (Exhibit E) evidence fraudulent intent, violating F.S. § 104.0616. Marks v. Stinson, 19 F.3d 873 (3d Cir. 1994), voids elections for VBM fraud. The 219,673 unauthorized requests (Exhibit B), including Judges Khouzam and Dubbeld (¶18), with 18 affidavits (Exhibit P), violate due process, requiring tribunal recusal and vacatur. John Siamas (Exhibit H) identified 219,673 unverified VBM requests… League of Women Voters v. Detzner, 172 So. 3d 363 (Fla. 2015), condemns election concealment, and Marks v. Stinson, 19 F.3d 873 (3d Cir. 1994), voids VBM fraud. These violations, with Judge Dubbeld's non-consent (¶18), evidence fraud. FVRS logs counties separately ("About Data Files Sent to FVRS"). Pinellas affidavits (Exhibit Q) confirm local fraud." ("Report: Absentee Status")

13. My investigation revealed Judge Jennifer Dubbeld, listed in Exhibit O, was unaware of her June 23, 2024, VBM request (Exhibit B). On October 22, 2024, then candidate for Judge Jennifer Dubbeld and I had a conversation reinforced my belief, based on Florida Department of State Division of Elections Vote by Mail Early Voting Reports and FVRS data (Exhibit B), 18 voter affidavits (Exhibit P), that unauthorized requests also targeted protected voters like Jennifer Dubbeld, creating bias requiring recusal (Rule 2.330(d)(1)).

14. Exhibit G confirms Judge Khouzam's active service on the Second DCA panel. Her name, and those of at least eight other judges on this court, appear in the vote-by-mail fraud data referenced by John Siamas (Exhibit H), indicating that the fraud is not isolated to a single individual but may compromise the structural neutrality of the entire reviewing tribunal. Rogers v. State, 630 So. 2d 513 (Fla. 1993), holds that cumulative bias creates structural error. The 219,673 unverified VBM requests, including Judges Khouzam and Dubbeld (Exhibit O), and assistants (Exhibit P), violate F.S. § 97.0585, compromising this tribunal's impartiality.

15. Based on cross-referenced data from the same public records referenced in Exhibit B, I have identified not only judges but also judicial assistants

assigned to chambers of the Second District Court of Appeal and the Sixth Judicial Circuit whose vote-by-mail ballots were fraudulently requested under similar circumstances. These unauthorized requests were also flagged as unverified (N status) and processed using blocked request paths. As judicial assistants are direct agents of their assigned judges, the inclusion of their voter records implicates those judges as potential material witnesses, further compromising their ability to serve impartially. This significantly expands the appearance of partiality across both trial and appellate benches and reinforces the existence of structural error that renders this tribunal constitutionally inadequate.

16. A detailed table of affected judges and judicial assistants is provided in Exhibit O, identifying 56 judicial officers and their assistants across the Second District Court of Appeal and Sixth Judicial Circuit with unverified vote-by-mail (VBM) requests on June 23, 2024, flagged as "N" (no verified ID) in the Florida Voter Registration System (FVRS) (Exhibit B). These include, but are not limited to, Judge Nelly N. Khouzam, Judge Morris Silberman, Judge Craig C Villanti, Judge Patricia Muscarella, Judge Thomas Ramsberger, Judge Judge Judge Jennifer Dubbeld, Chief Judge Shawn Crane's judicial assistant Louise Smith, Judge Edwin Jagger, Judge Lauralee G. Westine, Judge Kim Campbell, Judge Pamela A.M. Campbell, Judge

Sherwood Coleman, Judge Philip J Federico, Judge Evan Frayman, Judge Brian Gnage, Judge Mary M. Handsel, Judge Elizabeth Jack, Judge George Jirotka, Judge Doneene Loar, Judge Philippe Matthey, Judge Patrice Moore, Judge Cynthia J. Newton, Judge Nichole Pearlman, Judge Joshua Riba, Judge Pat Siracusa, Judge James R. Stearns, Judge Susan St. John, Judge Kimberly Todd, Judge Amy M. Williams, Judge John Carassas, Judge Diane Croff, Judge Robert Dittmer, Judge Holly Grissinger, Judge James Pierce, Judge John D Couriel, Judicial Assistant Debi McCarty, Judicial Assistant Stacy Wisman, Judicial Assistant Jill Psenisky, Judicial Assistant Bonnie Whitehall, Judicial Assistant Valerie McGivern, Judicial Assistant Melinda Vincent, Judicial Assistant Annie Nguyen, Judicial Assistant Jess Rayburn, Judicial Assistant Amber Demiduk, Judicial Assistant Veronica Jupiter, Judicial Assistant Lisa Schultz, Judicial Assistant Tracy Curley, Judicial Assistant Michelle Hall, Judicial Assistant JoAn Caffentzis, Judicial Assistant Vicki Masterson, Judicial Assistant Cheryl Nierengarten, Judicial Assistant Darleta Burris, Judicial Assistant Pamela Gariepy, Judicial Assistant Kim Haumann, all targeted in violation of F.S. § 97.0585, as protected voter profiles are blocked from online submissions (Exhibit I, "Dialog: Vote-By-Mail Request"). For example, Chief Judge Crane's assistant had an unverified request, implicating his chambers despite no

personal request, indicating a targeted scheme reaching judicial operations ("Report: Absentee Status for All Absentee Voters"). As judicial assistants are direct agents managing court functions, their compromised voter records create an appearance of bias for their judges, per Canon 3E(1)(a) of the Florida Code of Judicial Conduct. This pervasive fraud, affecting 56+ individuals across both trial and appellate benches, reinforces structural error rendering this tribunal constitutionally inadequate, as held in Rogers v. State, 630 So. 2d 513 (Fla. 1993), and Aetna Life Insurance Co. v. Lavoie, 475 U.S. 813 (1986) (¶19). The full scope, detailed in Exhibit O, mandates disqualification of Judge Khouzam and scrutiny of the entire tribunal to ensure due process. This table highlights the extent to which both trial and appellate court chambers are compromised, including instances where judges' assistants—but not the judges themselves—were targeted. Given their confidential role and direct connection to the judge's functioning, any such instance raises mandatory grounds for judicial disqualification under Canon 3E(1)(a). "For example, even in chambers where the judge's own record does not show a ballot request—such as Chief Circuit Shawn Crane—their judicial assistant's record was fraudulently accessed. This indicates a targeted scheme reaching into judicial chambers, rendering the judge a potential witness or person with direct knowledge of disputed facts."

Exhibit O lists numerous judicial assistants, assigned to numerous Judges, in the Sixth Circuit, with unverified VBM requests on June 23, 2024, flagged "N" in FVRS (Exhibit B). As direct agents managing judicial operations, their compromised voter records create an appearance of bias for their judges, per Canon 3E(1)(a), extending disqualification grounds to multiple Second DCA and Sixth Circuit panels.

17. The evidence shows that Judge Khouzam is both a material witness and a victim in the scheme central to this appeal. Under Rule 2.330(d)(1), disqualification is required when a judge has personal knowledge of disputed evidentiary facts. Canon 3E(1)(a) of the Florida Code of Judicial Conduct also mandates disqualification where a judge is likely to be a material witness.

18. The verified activity under Judge Khouzam's name and the appearance of her data in protected voter records, combined with the 'N' verification flags and administrative irregularities outlined in Exhibits C, I, and N, establish a well-grounded fear of judicial bias. Per Livingston v. State, 441 So. 2d 1083 (Fla. 1983), a reasonably prudent person would fear bias from Judge Khouzam, as her unauthorized VBM request (Exhibit B), confirmed by Judge Dubbeld's non-consent (¶18) and 18 voter affidavits (Exhibit P), violates F.S. § 97.0585, mandating disqualification.

19. The facts presented here would lead a reasonably prudent person to doubt Judge Khouzam's ability to remain impartial. Her continued participation in this appellate proceeding would violate my constitutional right to a fair and unbiased tribunal. The unauthorized VBM requests, including 219,673 on June 23, 2024, and withholding of audit logs, violates F.S. § 838.022 may violate F.S. § 104.061 (corrupt influence) and F.S. § 104.051 (election interference), constituting felonious acts that undermine judicial impartiality and public trust, further necessitating Judge Khouzam's recusal. Liljeberg v. Health Services Acquisition Corp., 486 U.S. 847 (1988), mandates disqualification under 28 U.S.C. § 455(a) when impartiality is questioned, as with Judge Khouzam's fraudulent VBM request (Exhibit B), corroborated by Judge Dubbeld (¶18) and 18 affidavits (Exhibit P), suggesting tribunal bias. Aetna Life Insurance Co. v. Lavoie, 475 U.S. 813 (1986), finds structural error when a judge has a personal stake, as with Judge Khouzam's and Judge Dubbeld's fraudulent VBM requests (Exhibit B), part of 219,673 violations (Exhibit P), tainting this tribunal. United States v. Microsoft Corp., 253 F.3d 34 (D.C. Cir. 2001), vacates rulings for apparent bias under 28 U.S.C. § 455(a). Judge Khouzam's and Judge Dubbeld's VBM fraud (Exhibit B), with 18 affidavits (Exhibit P), requires vacatur to protect due process. Caperton…

Williams… Liljeberg v. Health Services Acquisition Corp., 486 U.S. 847 (1988), and Aetna Life Insurance Co. v. Lavoie, 475 U.S. 813 (1986), mandate vacatur for bias… United States v. Microsoft Corp., 253 F.3d 34 (D.C. Cir. 2001), voids rulings for apparent bias affecting Judges Khouzam and Dubbeld (¶18).

20. My analysis of the State of Florida Division of Elections "Vote by Mail Early Voting Reports" and the VR Systems program documentation confirms that 219,673 vote by mail ballot requests made on Sunday, June 23, 2024, a date that the Supervisor of Elections was closed requires manipulation. As an election systems analyst I attest that 219,673 unverified requests require bots, automated or insider manipulation, violating F.S. § 104.061

21. The U.S. Supreme Court has made clear in *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009), and *Williams v. Pennsylvania*, 136 S. Ct. 1899 (2016), that judicial participation in cases where a judge is a material witness or has a personal stake constitutes a structural defect. These precedents apply directly here and demand disqualification as a matter of due process.

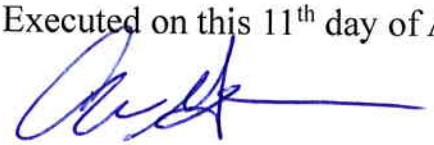
22. The information referenced in Exhibits E, F, I, and related VR Systems documentation was obtained directly from publicly accessible training and support materials hosted on the official VR Systems website

(https://www.vrsystems.com) and (https://content.vrsys.co/help/vf/Content/Voter_Registration/Dialog__Vote-by-Mail_Request.htm) or from publicly available sources previously published online. These documents were not obtained through confidential or privileged means and are available to election administrators, public records requestors, and researchers. Chastine v. Broome, 629 So. 2d 293 (Fla. 4th DCA 1993), requires vacatur if a biased judge rules. Judge Khouzam's fraudulent VBM request (Exhibit B), Judge Dubbeld's confirmation (¶18), and 219,673 violations (Exhibit P) mandate her disqualification to avoid voidable rulings.

23. I submit this affidavit in good faith and respectfully request that the Court consider these facts and disqualify Judge Nelly N. Khouzam from participation in this appeal. and respectfully request that the Court consider these facts and disqualify Judge Nelly N. Khouzam from participation in this appeal. I request Judge Khouzam's disqualification, a stay of proceedings under Rule 9.310 to compel FVRS log production, coordination with related cases per Rule 2.545, and an order under F.S. § 119.11 to access withheld logs, ensuring a fair tribunal and investigation of fraud affecting 219,673 VBM requests.

FURTHER AFFIANT SAYETH NAUGHT.

I declare under the penalty of perjury that the foregoing is true and correct.
Executed on this 11th day of April, 2025 at Largo, Florida.



/s/ Christopher Gleason

Christopher Gleason
2098 Seminole Boulevard, #6212
Largo, FL 33778
Phone 727-480-2059
Email: cpgleason72@gmail.com, gleason4pinellas@gmail.com

Sworn to and subscribed before me on this 11th day of April, 2025, by Christopher Gleason, who [X] is personally known to me or [ ] produced a Florida Driver's License as identification.

_____, No: _____).

/s/ _____
Notary Public
Name: _____
Commission No: _____
My Commission Expires: _____

CHRISTINE PETERS
Commission # HH 436653
Expires February 26, 2028

EXHIBIT B:

Excerpt Florida Department of State Vote By Mail Early Voting Reports

EXHIBIT B Excerpt of Florida Department of State, Division of Elections “Vote By Mail; Early Voting Report” For 09/03/2024

Covering August 2024 Primary – 06/23/2024 Illegal Vote By Mail Ballot Requests

Recor	Coun	VoterIdNumber	ElectionNi	ElectionDa	ElectionNa	LastRecorc	Vot	RequesteDate	Delivery Date	BallotRetu	Re	Mil	Ov	Mil	Prec	PrecinctSp	Congressi	SenateDis	HouseDist	CountyCo	SchoolBo	OtherDist	Party	Voter Name	M	MailingAd	MailingAd	MailingAddress	City	Mai	Mailing	Ma	E-mi	Fa	De	Voter	FLDL/	VoterSSN
VBM	PIN	106741060	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	BARTLETT, BRUCEL								BBAI			N	N	
VBM	PIN	106876672	43887	45524	2024 Prim	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	Y	N	Y										NPA	COLEMAN, SHERWOOD S											N	N	
VBM	PIN	107374929	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N										REP	CROFF, DIANE M											N	N	
VBM	PIN	111215604	43887	45524	2024 Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N										REP	DITTMER, ROBERT G								ROB			N	N	
VBM	PIN	107149377	43887	45524	2024 Prim	8/11/2024	P	6/23/2024	7/16/2024		N	N	N										REP	DUBBELD, JENNIFER C								DUB			N	N	
VBM	PIN	106986554	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										REP	FEDERICO, PHILIP J											N	N	
VBM	PIN	107285314	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	GNAGE, BRIAN E								bgna			N	N	
VBM	PIN	106995645	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	GRISSINGER, HOLLYT								griss			N	N	
VBM	PIN	107366706	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										NPA	JACK, ELIZABETH M											N	N	
VBM	PIN	103848463	43887	45524	2024 Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N										REP	JUPITER, VERONICA L								vero			N	N	
VBM	PIN	106993896	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										NPA	KELLY, LORRAINE M								LORI			N	N	
VBM	PIN	106723453	43887	45524	2024 Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N										REP	KHOUZAM, NELLYN											N	N	
VBM	PIN	106821566	43887	45524	2024 Prim	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N										REP	LENAS, JAMES S											N	N	
VBM	PIN	107338189	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	LOAR, DONEENE D								DON			N	N	
VBM	PIN	107285166	43887	45524	2024 Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N										DEM	LUCAS, CHERYLL								CHE			N	N	
VBM	PIN	107075643	43887	45524	2024 Prim	7/23/2024	V	6/23/2024	7/16/2024	7/23/2024	N	N	N										REP	MARCUS, JULIE K											N	N	
VBM	PIN	107150747	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N										NPA	MASTERSON, VICKIA								lmki			N	N	
VBM	PIN	107385240	43887	45524	2024 Prim	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N										REP	MATTHEY, PHILIPPE											N	N	
VBM	PIN	106958587	43887	45524	2024 Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N										DEM	MOORE, PATRICE W								pwm			N	N	
VBM	PIN	106784723	43887	45524	2024 Prim	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N										REP	MUSCARELLA, PATRICIA A								tmus			N	N	
VBM	PIN	107071107	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N										REP	NEWTON, CYNTHIA J											N	N	
VBM	PIN	100554220	43887	45524	2024 Prim	8/10/2024	P	6/23/2024	7/16/2024		N	N	N										REP	PEARLMAN, NICOLE M								NPE			N	N	
VBM	PIN	106815101	43887	45524	2024 Prim	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N										REP	PIERCE, JAMES V								jame			N	N	
VBM	PIN	107171797	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										DEM	RAMSBERGER, ANGELA M								ANG			N	N	
VBM	PIN	107143704	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N										NPA	RAMSBERGER, THOMAS M								TOM			N	N	
VBM	PIN	106991733	43887	45524	2024 Prim	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N										REP	RIBA, JOSHUA B								JRIB			N	N	
VBM	PIN	106869196	43887	45524	2024 Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N										NPA	SILBERMAN, MORRIS											N	N	
VBM	PIN	107328087	43887	45524	2024 Prim	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N										NPA	ST JOHN, SUSAN											N	N	
VBM	PIN	106750878	43887	45524	2024 Prim	6/25/2024	P	6/23/2024	7/16/2024		N	N	N										REP	STEARNS, JAMES R								aste			N	N	
VBM	PIN	106869683	43887	45524	2024 Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N										REP	TODD, KIMBERLY P								KIMI			N	N	
VBM	PIN	113787369	43887	45524	2024 Prim	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N										NPA	VILLANTI, CRAIG C								CCV			N	N	
VBM	PIN	106972664	43887	45524	2024 Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N										REP	WESTINE, LAURALEE G								lwes			N	N	
VBM	PIN	106715884	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										REP	WILLIAMS, AMY M											N	N	
VBM	PIN	107067204	43887	45524	2024 Prim	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	416	416	13	18	61	6	6	CCA,1	CT	REP	MCCARTY, DEBRAL	10			TAMPA	FL	33612					N	N	
VBM	PIN	106817396	43887	45524	2024 Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	421	421	13	18	58	5	5	CCA,2	CT	REP	JIROTKA, GEORGEM	11			BELLEAIR SHORE	FL	33786					N	N	
VBM	PIN	125032393	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	516	516	13	21	58	5	5	CCA,2	CT	DEM	SMITH, LOUISEP	12			CLEARWATER	FL	33755					N	N	
VBM	PIN	107388567	43887	45524	2024 Prim	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	518	518.1	13	21	58	5	5	CCA,2	CT	DEM	GUALTIERI, GALAS	13			CLEARWATER	FL	33755					N	N	
VBM	PIN	123861050	43887	45524	2024 Prim	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	606	606.1	13	21	57	4	4	CCA,1	CT	REP	HALL, MICHELLE B	13			SAFETY HARBOR	FL	34695					N	N	
VBM	PIN	107377969	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	517	517.1	13	21	58	5	5	CCA,2	CT	NPA	HAUMANN, KIMM	14			CLEARWATER	FL	33755	KIMI				N	N	
VBM	PIN	120581459	43887	45524	2024 Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	539	539	13	21	57	4	4	CCA,2	FC	DEM	SCHULTZ, LISAM	18			PALM HARBOR	FL	34683	LISA				N	N	
VBM	PIN	106772419	43887	45524	2024 Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	632	632	13	21	57	4	4	CCA,1	FC	REP	SIRACUSA, PAT	18			PALM HARBOR	FL	34684	PATS				N	N	
VBM	PIN	106862612	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	530	530	13	21	57	4	4	CCA,2	CT	REP	DESANTIS, KARENA	18			DUNEDIN	FL	34698	kdes				N	N	
VBM	PIN	106862613	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	530	530	13	21	57	4	4	CCA,2	CT	REP	DESANTIS, RONALDD	18			DUNEDIN	FL	34698	DES/				N	N	
VBM	PIN	107203935	43887	45524	2024 Prim	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	420	420.1	13	18	58	5	5	CCA,2	CT	NPA	FRAYMAN, EVAN G	20			INDIAN ROCKS BEACH	FL	33785	efray				N	N	
VBM	PIN	106926631	43887	45524	2024 Prim	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	622	622	13	21	57	4	4	CCA,1	CT	NPA	CAFFENTZIS, JOAN	20			OLDSMAR	FL	34677	joma				N	N	
VBM	PIN	113659838	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	155	155.1	14	18	60	6	6	CCA,3	CT	REP	RAYBURN, JESSICAD	30			ST PETERSBURG	FL	33702	jessi				N	N	
VBM	PIN	107033915	43887	45524	2024 Prim	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	625	625	13	21	57	4	4	CCA,1	FC	DEM	DEMIDUK, AMBER D	31			PALM HARBOR	FL	34684-4	ADEI				N	N	
VBM	PIN	124912657	43887	45524	2024 Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	623	623.1	13	21	58	4	4	CCA,1	CT	REP	WHITEHALL, BONNIEM	31			CLEARWATER	FL	33761					N	N	
VBM	PIN	106873482	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	636	636	13	21	57	4	4	CCA,1	FC	REP	VINCENT, MELINDAL	31			PALM HARBOR	FL	34685	VINC				N	N	
VBM	PIN	107033524	43887	45524	2024 Prim	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	627	627.1	13	21	57	4	4	CCA,1	FC	REP	NIERENGARTEN, CHERYL D	43			OLDSMAR	FL	34677	CNIE				N	N	
VBM	PIN	106981943	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	244	244	13	18	61	7	7	CCA,1	CT	REP	MCGIVERN, VALERIE B	48			KENNETH CITY	FL	33709	kishl				N	N	
VBM	PIN	106978328	43887	45524	2024 Prim	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	216	216	13	18	61	7	7	CCA,3	CT	NPA	PSENISKY, JILLS	55			ST PETERSBURG	FL	33707	Jill.P				N	N	
VBM	PIN	106859620	43887	45524	2024 Prim	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	244	244.1	13	18	61	7	7	CCA,1	FC	REP	BURRIS, DARLETAJ	56			ST PETERSBURG	FL	33709	DJB1				N	N	
VBM	PIN	107379308	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	232	232	13	18	61	7	7	CCA,3	CT	DEM	NGUYEN, ANNP	56			ST PETERSBURG	FL	33710	annp				N	N	
VBM	PIN	106878898	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	230	230	13	18	61	7	7	CCA,3	CT	DEM	CURLEY, TRACYD	63			ST PETERSBURG	FL	33710					N	N	
VBM	PIN	107118442	43887	45524	2024 Prim	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	712	712.1	13	21	57	4	4	CCA,2	CT	REP	WISMAN, STACYL	84			TARPON SPRINGS	FL	34689	stac				N	N	

EXHIBIT B: Excerpt of Florida Department of State, Division of Elections "Vote By Mail; Early Voting Report" For 11/09/2024

County	VoterIdNum	ElectionNu	ElectionDa	ElectionNa	LastRecord(	Voti	RequestedI	Delivery Dat	BallotReturn	Req	Mili	Ov	Mil	Preci	Precin	Con	Sen	Hou	Con	Sc	OtherDistr	Party	Voter Name	Mail	Ma	Mai	MailingAd	MailingAd	MailingAd	E-ma	Faxn	Des	Des	Voter	FLDL/	VoterSSN4
PIN	106741060	43888	11/5/2024	2024 Gene	10/29/2024	V	9/9/2024	10/1/2024	10/29/2024	N	N	N										REP	BARTLETT, BRUCEL							BBAF				N	N
PIN	107167732	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	CAMPBELL, KIMBERLY A							KIMC				N	N
PIN	106758700	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	CAMPBELL, PAMELA AM											N	N
PIN	107149377	43888	11/5/2024	2024 Gene	10/30/2024	P	9/9/2024	10/1/2024		N	N	N										REP	DUBBELD, JENNIFER C							DUBI				N	N
PIN	107125137	43888	11/5/2024	2024 Gene	11/5/2024	V	9/9/2024	10/1/2024	11/5/2024	N	N	N										REP	FESTA, NOELLE E											N	N
PIN	110785320	43888	11/5/2024	2024 Gene	9/11/2024	P	9/9/2024	10/1/2024		N	N	N										REP	GIBSON, KATHLEEN E							kathi				N	N
PIN	117216165	43888	11/5/2024	2024 Gene	11/2/2024	V	9/9/2024	10/1/2024	11/2/2024	N	N	N										NPA	GRIMES, WENDY L							wgrir				N	N
PIN	106808845	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										NPA	HILL, KAREN D							KIKID				N	N
PIN	107366706	43888	11/5/2024	2024 Gene	10/22/2024	P	9/9/2024	10/1/2024		N	N	N										NPA	JACK, ELIZABETH M											N	N
PIN	130471287	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N										REP	JAGGER, BLAKE B							BJAC				N	N
PIN	106832762	43888	11/5/2024	2024 Gene	11/2/2024	V	9/9/2024	10/1/2024	11/2/2024	N	N	N										REP	JAGGER, EDWIN B							EJAG				N	N
PIN	111191787	43888	11/5/2024	2024 Gene	10/24/2024	V	9/9/2024	10/1/2024	10/24/2024	N	N	N										REP	KAHN, JARED D							jared				N	N
PIN	107015570	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	KERR, CHRISTOPHIR A							CHRI				N	N
PIN	107018866	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	KERR, LISA M							KERF				N	N
PIN	106723453	43888	11/5/2024	2024 Gene	11/1/2024	P	9/9/2024	10/1/2024		N	N	N										REP	KHOUZAM, NELLY N											N	N
PIN	107203473	43888	11/5/2024	2024 Gene	11/3/2024	V	9/9/2024	10/1/2024	11/3/2024	N	N	N										REP	KOSKINAS, THOMAS D							TOMI				N	N
PIN	107338188	43888	11/5/2024	2024 Gene	10/15/2024	V	9/9/2024	10/1/2024	10/15/2024	N	N	N										REP	LOAR, DONEENED							DON				N	N
PIN	107075643	43888	11/5/2024	2024 Gene	10/21/2024	V	9/9/2024	10/1/2024	10/21/2024	N	N	N										REP	MARCUS, JULIE K											N	N
PIN	107385240	43888	11/5/2024	2024 Gene	10/13/2024	V	9/9/2024	10/1/2024	10/13/2024	N	N	N										REP	MATTHEY, PHILIPPE											N	N
PIN	106958587	43888	11/5/2024	2024 Gene	10/23/2024	V	9/9/2024	10/1/2024	10/23/2024	N	N	N										DEM	MOORE, PATRICEW							pwm				N	N
PIN	106784723	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	MUSCARELLA, PATRICIA A							tmus				N	N
PIN	107071107	43888	11/5/2024	2024 Gene	11/5/2024	V	9/9/2024	10/1/2024	11/5/2024	N	N	N										REP	NEWTON, CYNTHIA J											N	N
PIN	100554220	43888	11/5/2024	2024 Gene	10/7/2024	V	9/9/2024	10/1/2024	10/7/2024	N	N	N										REP	PEARLMAN, NICOLE M							NPEA				N	N
PIN	106894052	43888	11/5/2024	2024 Gene	11/1/2024	P	9/9/2024	10/1/2024		N	N	N										REP	PETERS, KATHLEEN M							Kathl				N	N
PIN	107171787	43888	11/5/2024	2024 Gene	11/5/2024	V	9/9/2024	10/1/2024	11/5/2024	N	N	N										DEM	RAMSBERGER, ANGELA M							ANG				N	N
PIN	107143704	43888	11/5/2024	2024 Gene	10/25/2024	V	9/9/2024	10/1/2024	10/25/2024	N	N	N										NPA	RAMSBERGER, THOMAS M							TOMI				N	N
PIN	106991733	43888	11/5/2024	2024 Gene	10/18/2024	V	9/9/2024	10/1/2024	10/18/2024	N	N	N										REP	RIBA, JOSHUA B							JRIBA				N	N
PIN	100307077	43888	11/5/2024	2024 Gene	10/7/2024	V	9/9/2024	10/1/2024	10/7/2024	N	N	N										REP	ROSS, ADAM M											N	N
PIN	106869196	43888	11/5/2024	2024 Gene	11/1/2024	P	9/9/2024	10/1/2024		N	N	N										NPA	SILBERMAN, MORRIS											N	N
PIN	107328057	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N										NPA	ST JOHN, SUSAN											N	N
PIN	106750378	43888	11/5/2024	2024 Gene	10/30/2024	V	9/9/2024	10/1/2024	10/30/2024	N	N	N										REP	STEARNS, JAMES R							astea				N	N
PIN	117723880	43888	11/5/2024	2024 Gene	10/21/2024	V	9/9/2024	10/1/2024	10/21/2024	N	N	N										REP	SULLIVAN, COURTNEY A							COU				N	N
PIN	106869683	43888	11/5/2024	2024 Gene	10/25/2024	V	9/9/2024	10/1/2024	10/25/2024	N	N	N										REP	TODD, KIMBERLY P							KIMP				N	N
PIN	113787368	43888	11/5/2024	2024 Gene	10/24/2024	V	9/9/2024	10/1/2024	10/24/2024	N	N	N										NPA	VILLANTI, CRAIG C							CCVI				N	N
PIN	106572664	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N										REP	WESTINE, LAURALEE G							lwest				N	N
PIN	106715884	43888	11/5/2024	2024 Gene	10/23/2024	V	9/9/2024	10/1/2024	10/23/2024	N	N	N										REP	WILLIAMS, AMY M											N	N
PIN	112888181	43888	11/5/2024	2024 Gene	10/27/2024	V	9/9/2024	10/1/2024	10/27/2024	N	N	N										NPA	ARROJO GNAGE, ANN KRISTEN I							karro				N	N
PIN	106835464	43888	11/5/2024	2024 Gene	10/23/2024	V	9/9/2024	10/1/2024	10/23/2024	N	N	N										REP	CARASSAS, JOHN							CARA				N	N
PIN	106876672	43888	11/5/2024	2024 Gene	10/23/2024	P	9/9/2024	10/1/2024		Y	N	Y										NPA	COLEMAN, SHERWOOD S											N	N
PIN	107374928	43888	11/5/2024	2024 Gene	10/31/2024	V	9/9/2024	10/1/2024	10/31/2024	N	N	N										REP	CROFF, DIANE M											N	N
PIN	106586554	43888	11/5/2024	2024 Gene	10/15/2024	V	9/9/2024	10/1/2024	10/15/2024	N	N	N										REP	FEDERICO, PHILIP J											N	N
PIN	121758410	43888	11/5/2024	2024 Gene	11/2/2024	V	9/9/2024	10/1/2024	11/2/2024	N	N	N										DEM	SILBERMAN, GABRIELLE C							GABI				N	N
PIN	115152501	43888	11/5/2024	2024 Gene	10/25/2024	V	9/9/2024	10/1/2024	10/25/2024	N	N	N	627	627	13	21	57	4	4	CCA,1 | FC	REP	ZUROWESTE, MARKS	105		OLI	FL	34677		z.din				N	N
PIN	106817356	43888	11/5/2024	2024 Gene	10/22/2024	V	9/9/2024	10/1/2024	10/22/2024	N	N	N	421	421	13	18	58	5	5	CCA,2 | CT	REP	JIROTKA, GEORGE M	112		BEL	FL	33786						N	N
PIN	125032393	43888	11/5/2024	2024 Gene	11/2/2024	V	9/9/2024	10/1/2024	11/2/2024	N	N	N	516	516	13	21	58	5	5	CCA,2 | CT	DEM	SMITH, LOUISE P	121		CLE	FL	33755						N	N
PIN	106815658	43888	11/5/2024	2024 Gene	10/26/2024	V	9/9/2024	10/1/2024	10/26/2024	N	N	N	516	516	13	21	58	5	5	CCA,2 | CT	DEM	BATTLE, MARLENA J	172		CLE	FL	33755						N	N
PIN	106772418	43888	11/5/2024	2024 Gene	10/18/2024	V	9/9/2024	10/1/2024	10/18/2024	N	N	N	632	632	13	21	57	4	4	CCA,1 | FC	REP	SIRACUSA, PAT	180		PAL	FL	34684		PATS				N	N
PIN	118836062	43888	11/5/2024	2024 Gene	10/30/2024	V	9/9/2024	10/1/2024	10/30/2024	N	N	N	622	622	13	21	57	4	4	CCA,1 | CT	DEM	VONDERHEIDE, EMILY A	181		OLI	FL	34677		emily				N	N
PIN	106862612	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N	530	530	13	21	57	4	4	CCA,2 | CT	REP	DESANTIS, KAREN A	183		DUI	FL	34698		kales				N	N
PIN	106862613	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N	530	530	13	21	57	4	4	CCA,2 | CT	REP	DESANTIS, RONALD D	183		DUI	FL	34698		DESA				N	N
PIN	106814594	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N	543	543	13	21	57	4	4	CCA,2 | FC	REP	HANDSEL, MARY M	188		PAL	FL	34683		mhar				N	N
PIN	107203835	43888	11/5/2024	2024 Gene	10/25/2024	V	9/9/2024	10/1/2024	10/25/2024	N	N	N	420	420	13	18	58	5	5	CCA,2 | CT	NPA	FRAYMAN, EVANG	200		IND	FL	33785		efray				N	N
PIN	106873787	43888	11/5/2024	2024 Gene	10/7/2024	V	9/9/2024	10/1/2024	10/7/2024	N	N	N	511	511	13	21	58	5	5	CCA,2 | CT	REP	STANLEY, BRYAN J	205		CLE	FL	33756		BRYA				N	N
PIN	107176725	43888	11/5/2024	2024 Gene	10/26/2024	V	9/9/2024	10/1/2024	10/26/2024	N	N	N	420	420	13	18	58	5	5	CCA,2 | CT	REP	SCHOLL, MARY J	220		IND	FL	33785						N	N
PIN	113659838	43888	11/5/2024	2024 Gene	11/4/2024	V	9/9/2024	10/1/2024	11/4/2024	N	N	N	155	155	14	18	60	6	6	CCA,3 | CT	REP	RAYBURN, JESSICAD	301		STI	FL	33702		jessi				N	N
PIN	123610805	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N	241	241	13	18	61	7	7	CCA,3 | CT	DEM	SERCUS, ELIZABETH A	310		STI	FL	33710		beth				N	N
PIN	124512657	43888	11/5/2024	2024 Gene	10/21/2024	V	9/9/2024	10/1/2024	10/21/2024	N	N	N	623	623	13	21	58	4	4	CCA,1 | CT	REP	WHITEHALL, BONNIEM	316		CLE	FL	33761						N	N
PIN	106873482	43888	11/5/2024	2024 Gene	10/21/2024	V	9/9/2024	10/1/2024	10/21/2024	N	N	N	636	636	13	21	57	4	4	CCA,1 | FC	REP	VINCENT, MELINDAL	319		PAL	FL	34685		VINC				N	N
PIN	107071730	43888	11/5/2024	2024 Gene	10/22/2024	V	9/9/2024	10/1/2024	10/22/2024	N	N	N	621	621	13	21	57	4	4	CCA,1 | CT	REP	CHRISTISON, TERESA J	384		OLI	FL	34677		TCHR				N	N
PIN	106881843	43888	11/5/2024	2024 Gene	11/3/2024	V	9/9/2024	10/1/2024	11/3/2024	N	N	N	244	244	13	18	61	7	7	CCA,1 | CT	REP	MCGIVERN, VALERIE B	485		KEN	FL	33705		kishk				N	N
PIN	125746368	43888	11/5/2024	2024 Gene	10/26/2024	V	9/9/2024	10/1/2024	10/26/2024	N	N	N	627	627	13	21	57	4	4	CCA,1 | FC	DEM	GALLATY, CONAN A	497		OLI	FL	34677		cgall				N	N
PIN	125836313	43888	11/5/2024	2024 Gene	11/1/2024	V	9/9/2024	10/1/2024	11/1/2024	N	N	N	627	627	13	21	57	4	4	CCA,1 | FC	DEM	GALLATY, NATASHAR	497		OLI	FL	34677		nrgal				N	N
PIN	107379308	43888	11/5/2024	2024 Gene	10/26/2024	V	9/9/2024	10/1/2024	10/26/2024	N	N	N	232	232	13	18	61	7	7	CCA,3 | CT	DEM	NGUYEN, ANN P	567		STI	FL	33710		annp				N	N
PIN	107001354	43888	11/5/2024	2024 Gene	10/24/2024	V	9/9/2024	10/1/2024	10/24/2024	N	N	N	144	144	14	18	60	6	6	CCA,3 | CT	REP	SCHORSCH, PETER D	573		STI	FL	33703		Saint				N	N
PIN	111125724	43888	11/5/2024	2024 Gene	10/31/2024	P	9/9/2024	10/1/2024		N	N	N	144	144	14	18	60	6	6	CCA,3 | CT	DEM	TODD SCHORSCH, ROBIN M	573		STI	FL	33703		rmicl				N	N
PIN	106735562	43888	11/5/2024	2024 Gene	10/15/2024	V	9/9/2024	10/1/2024	10/15/2024	N	N	N	222	222	13	18	61	7	7	CCA,3 | CT	DEM	POLSON, HERBERT E	614		STI	FL	33710		herbj				N	N
PIN	106739520	43888	11/5/2024	2024 Gene	10/15/2024	V	9/9/2024	10/1/2024	10/15/2024	N	N	N	222	222	13	18	61	7	7	CCA,3 | CT	DEM	POLSON, MARILYN M	614		STI	FL	33710		maril				N	N
PIN	107118442	43888	11/5/2024	2024 Gene	10/17/2024	V	9/9/2024	10/1/2024	10/17/2024	N	N	N	712	712	13	21	57	4	4	CCA,2 | CT	REP	WISMAN, STACY L	845		TAF	FL	34689		stacy				N	N
PIN	106730927	43888	11/5/2024	2024 Gene	10/29/2024	V	9/9/2024	10/1/2024	10/29/2024	N	N	N	254	254	13	18	61	6	6	CCA,1 | CT	NPA	HELINGER, JOHN J	890		SEN	FL	33777		jackh				N	N
PIN	106734148	43888	11/5/2024	2024 Gene	10/31/2024	V	9/9/2024	10/1/2024	10/31/2024	N	N	N	135	135	14	16	60	7	7	CCA,3 | CT	DEM	WILLIAMS, EMILY B	939		STI	FL	33701						N	N

EXHIBIT C:

Pinellas County Supervisors of Elections Office Hours

votepinellas.gov

Deadline to register to vote and/or change party affiliation: February 10, 2025

Deadline to request a ballot be mailed to you: February 27, 2025, at 5:00 p.m.

TRACK MY MAIL BALLOT

FIND MY POLLINGPLACE

Early Voting: Not conducted for municipal elections

Secure Mail Ballot Return Locations: One of our three offices

Election Day: March 11, 2025

Polls Open: 7:00 a.m. – 7:00 p.m.

Get Election Ready!

Request Sample Ballot

NEWS

HURRICANE RESPONSE

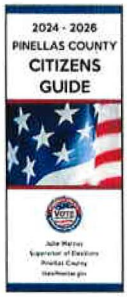
HURRICANE RESPONSE PAGE

For information on our hurricane response and election updates, visit our dedicated hurricane response page.

DATES TO REMEMBER

MARCH 11, 2025

MUNICIPAL ELECTIONS
Registration Deadline: February 10, 2025
Mail Ballot Request Deadline: February 27, 2025



DOWNLOAD THE PINELLAS COUNTY VOT CITIZENS GUIDE

The Voter Handbook includes an overview of voting i dates for upcoming elections, information on updatin information, how to request a mail ballot, what to ex or on Election Day and frequently asked questions. Th names and contact information of Pinellas County off

View 2024-25 Voter Handbook here
Vea el Manual de Votantes 2024-25 aquí

View the 2024-26 Citizens Guide here
Vea la Guía Para Ciudadanos 2024-26 aquí

The Florida Division of Elections also publishes a vote

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email:** Election@VotePinellas.gov | Public Records Request Form

P:(727) 464-VOTE (8683) • F:(727) 464-6239

Election Service Center
13001 Starkey Rd.
Largo, FL 33773
(Starkey Lakes Corporate Center)

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

County Building
501 First Avenue North
St. Petersburg, FL 33701
(Fifth Street North Entrance

F.S. 668.6076 Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. To submit a public re

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email:** Election@VotePinellas.gov | Public Records Request Form

P:(727) 464-VOTE (8683) • F:(727) 464-6239

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

ot want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by

June 2024

Add Holidays | More...

Save
sign in

Print

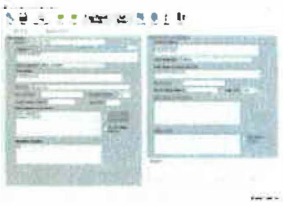
Sun	Mon	Tue	Wed	Thu	Fri	Sat
						1
2	3	4	5	6	7	8
9	10	11	12	13	14	15
16	17	18	19	20	21	22
23	24	25	26	27	28	29
30						

EXHIBIT D:

VR Systems: "Dialog: Process Web Vote-By-Mail Requests" (Protected Voter Display)

Process Web Vote-By-Mail Requests

To access: **Vote By Mail > Process Web Requests > {*request*}**



From this dialog, you can process a Vote-By-Mail Request submitted on your website into the voter's record. The election's status must be Active or Return Processing Only to process Vote-By-Mail Requests submitted on the web.

> **Note:** Once a Web Request has been processed (either by pressing **Save** or **Save and Print**), a row recording this activity will appear on the Comms tab of the affected voter's Voter Maintenance record. The Web Absentee Request communication will reflect the date the request was submitted, not the date it was processed.

If the voter has already voted—either by voting early, by in-office absentee, or by returning a mail ballot—you will see a message to that effect when you access the request. At that point you can either reject the request or process it manually. Either way removes it from the queue. No record of the rejection or decision to manually process the request is made on the voter's **Audit** tab.

If the election's status is not one of these, you will see a message to that effect and you should reject the request.

When you access a request, if you see messages indicating:

- the election's status is not Active or Return Processing Only

or

- the voter's precinct is not voting in the election

you should reject the request. No record will be made in the voter's record.

If the voter making the request is a Protected Voter, the program will hide the residence, mailing, and ballot addresses by displaying ****Protected****.

Toolbar

Save	Processes the request into the voter's record where it will appear on theirVote-By-Mail tab.

Process Manually	Removes the request from the queue. You have the option of printing a copy of the request to assist with manual processing. No record of the rejection is made on the voter's **Audit** tab.
Reject Request	Deny the request and remove the request from the queue. No record of the rejection is made on the voter's **Audit** tab.
Voters	Opens the voter's registration record.

Web Request

Election	*Display only field.* Shows *All Elections* or the name of the single election for which the voter requested a ballot.
Submitted Date	*Display only field.* The time and date when the request was submitted on the county website.
Residence	The residential address entered by the voter on the request form. It is informational only and is not copied to the voter's record.
Voter Classification	*Display only field.* Derived from the voter classification that the voter selects on the online form. This information will be copied to the voter's record. So for example, if a voter is not currently designated as Overseas or Military and they claim this classification on the online form (and provide a supporting overseas address if required for the classification they are claiming), the Overseas or Military flag will be set in their voter registration record when the Vote-By-Mail Request is processed.
Email Address	*Display only field.* If the voter provided an email address with their request, this field is copied to the Vote-By-Mail tab of the voter's record, overwriting any email address already there.
Signature	*Display only field.* The signature text entered by the person who submitted the request.

Phone Number	*Display only field.* The phone number, if the voter supplied one on their request. It is provided here for situations when you need to contact the voter about their request. This phone number is saved to the **View Web Absentee Request** dialog in the voter's record (not the **Telephone** field on the **Maint** tab). To access the **View Web Absentee Request** dialog, go to the **Comms** tab and double-click the entry marked **Web Absentee Request**.
Requested Delivery	*Display only field.* This field will display the voter's requested delivery method—**Mail**, **Email**, **Fax**, or **AcOnline**.
Driver's License/State ID	The voter's driver's license or state ID number, if entered on the request form.
Last 4 SSN	The last four digits of the voter's Social Security Number, if entered on the request form.
Ballot Address for this Election *Displayed if voter requested ballot for one election only.* **Ballot Address for All Elections** *Displayed if voter requested ballots for all elections.*	On the online Absentee/Mail Ballot Request form, the voter selected the option **I wish to receive my ballot(s) at the address designated below** and provided an address in the fields provided when this option is selected. Unless you select one of the two check boxes, processing the request will copy the address to the Vote-By-Mail Addresses dialog in the voter's record: For single election requests, the address is copied to the **Ballot Addressfor this Election** fields. For all-elections requests, the address is copied to the **Default Ballot Address** fields. If you want to modify this address, click in the box to open a dialog for editing.

Same as Mailing Address (Do not update address)	This check box is selected automatically when the mailing address on the request is identical to the mailing address in the voter's record. It prevents the processing program from updating the voter's mailing address with the ballot address entered on the web form. You would manually select this check box if you think the mailing address on record is more accurate than the one the voter submitted—for example, if the address in the request has spelling errors. When this check box is not selected, saving the request saves the address in this field to the **Ballot Address for This Election** (if the request is for a single election) or the **Default Ballot Address** (if an all-elections request) in the voter's record.
Move to Mailing Address	Select to have the address provided by the voter copied to the mailing address in the voter's record.
Requester Information	Indicates whether the request was made by the voter (Self) or another person who is a family member or legal guardian of the voter (Requester). For a *Requester* (person other than the voter), the information that displays is the requester's name, address, relationship to voter, and when provided in the MBRS request, the last four digits of the requester's Social Security Number or driver license/state ID number. To modify the requester information, click in the box to open a dialog for editing. You can also view and edit the requester information from the Vote-By-Mail tab > Mail-Ballot Adjustments > Maintain Requester Information dialog in the voter's record.

UOCAVA Address Provided by Voter	If the voter requested a delivery method other than mail, this address was required on the web request to validate that the voter has UOCAVA status. Any address displayed here will be discarded when you save the request unless you select the **Move to Mailing Address** field next to the UOCAVA address, which will overwrite the mailing address on the voter's record. If you want to modify this address, click in the box to open a dialog for editing.
Move to Mailing Address	Copies the address in the **UOCAVA Address Provided by Voter** field to the voter's mailing address.

Information from the Voter's Existing Record

Voter's Residence Address	*Display only field.* The residential address in the voter's record. If the voter provided a different residential address on the web request, it will not be copied to the voter registration record.
Voter Classification	*Display only field.* Derived from the **Military**and **Mil Dep** fields in the voter's record.
Email Address (on Vote-By-Mail Tab)	*Display only field.* If the voter provided an email address on a previous request and it is present on theVote-By-Mailtab of their record, it will be shown here. If they provided an email address on the current web request, it will be copied to the **Email** field on their **Vote-By-Mail** tab, overwriting any email address already there.
Phone Number	*Display only field.* The phone number from the voter's record. If the voter entered a phone number on the web request, it is not copied to their record.

Driver's License/State ID	The voter's driver's license or state ID number, if entered in the voter's record.
Last 4 SSN	The last four digits of the voter's Social Security Number, if entered in the voter's record.
Ballot Address for This Election *(single election requests)* **or** **Default Ballot Address** *(all-elections requests)*	*Display only field.* If the voter already has a request for this election, this field displays the ballot address for this election, if one exists on the Vote-By-Mail Addresses dialog in their record. If the voter has a default ballot address on the **Vote-By-Mail Addresses** dialog, it will be displayed here.
Mailing Address	*Display only field.* If the voter has a mailing address, it will be displayed here.
Clear Mailing Address	Select if you want to remove the existing mailing address from the voter's record when you click **Save** to process the request.
Remarks	If the voter already has a request for the election or they are ineligible, the system will note it here. You can edit this field with additional comments, if you like. The contents of this field are saved to the **Remarks** field on the **View Web Absentee Request** dialog in the voter's record. To access this dialog, go to the **Comms** tab and double-click the entry marked **Web Absentee Request**.

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EXHIBIT E:

VR Systems: "About Data Files Sent to FVRS by Voter Focus")

Data Files Sent to FVRS by Voter Focus

This topic describes the files Voter Focus automatically sends to the State system. Files are automatically sent by Voter Focus which runs automatically after midnight every day and for every two hours thereafter.

Daily Election Files

Counties are required to prepare and transmit to the State three files pertaining to voting by mail and early voting in an election. The Absentee Ballot Request Information file must be sent daily beginning 70 days before an election and for 15 days after the election. The two early voting files (Early Voting Summary and Early Voting Voters List) are sent each day beginning the first day of early voting and for three days after the end of early voting.

Each daily election file is a complete report of voting in the election so far; they overwrite the daily files sent previously.

The three files are transmitted automatically by the Voter Focus program Send Public Files, which runs automatically after midnight every day and for every two hours thereafter. If one or more of these files have not been sent to the State by 8 am during the reporting period, you will see a Send Public Files alert in VR Dashboard (and will receive an email if Alerts Maintenance is set up to send emails for the Send Public Files alert).

- **Vote-By-Mail Ballot Request Information File**—Lists county voters who have requested a mail ballot for an election, the status of the request, and other relevant data. Protected voters will be included in these files, with sensitive information such as address, precinct, and district redacted.

  Note: In the Candidate File Distribution portal, this file is known as the County Mail Ballot Status File.

  This file is automatically created and sent to FVRS daily (overnight) beginning 70 days prior to an election and ending on the 15th day after the election. If a general election is preceded by a primary, a separate file is sent for each election.

  The file contains information processed up to close of business on the day prior to the overnight run. Each daily file contains all Vote-By-Mail voters to date, not just new additions. It can contain Vote-By-Mail data for multiple elections. A copy of each file sent to the state is placed in \Vr6Sharedbinaries\FVRSUpload. The file name is *<county code>_VBM_<FVRS election number>_<date of run>_<time of run>*.

  Contents of the file, reading left to right:

Header	Description	Format
RecordType	Vote-by-Mail ballot request status	VBM
CountyID	County providing summary	Char (3) — FVRS code
Voter IdNumber	Voter ID number	Numeric (10)
ElectionNumber	Election identifier	Numeric (10)
ElectionDate	Date of the election	MM/DD/YYYY
ElectionName	Name of election	Char (35)
LastRecordChangeDate	Date the vote-by-mail summary record was last updated	MM/DD/YYYY
VoteByMail	C—Canceled by the voter or the voter moved out of county before the ballot was provided to voter E—Voter error or eligibility issue L—Returned untimely N—Unsigned (no signature provided on certificate or affidavit) P—Provided by any proper means of delivery R—Requested (this election) S—Standing (all elections) U—Returned undeliverable V—Returned and voted timely X—Mismatched signature on the certificate or affidavit	Char (1)
RequestDate		MM/DD/YYYY

Header	Description	Format
DeliveryDate		MM/DD/YYYY
BallotReturnDate	Overseas ballots received during the 10-day period after Election Day for a presidential preference primary or general election shall be recorded with a return day of Election Day if the ballot counted.	MM/DD/YYYY
RequestCanceledDate		MM/DD/YYYY
Military		Char (1) Y, N
OverseasFlag		Char (1) Y, N
MilitaryDependent		Char (1) Y, N
Precinct		Char (6)
PrecinctSplit		Char (10)
CongressionalDistrict		Numeric (2)
SenateDistrict		Numeric (2)
HouseDistrict		Numeric (3)
CountyCommissionDistrict		Char (10)
SchoolBoardDistrict		Char (10)
OtherDistricts		Char (25)
Party		Char (3)
VoterName		Char (99)
MailingAddressLine1		Char (40)
MailingAddressLine2		Char (40)
MailingAddressLine3		Char (40)
MailingAddressCity		Char (40)
MailingAddressState		Char (2)
MailingAddressZip		Char (15)
MailingAddressCountry		Char (40)
EmailAddress		Char (100)
FaxNumber		Char (20)
DesigneeNameRequest	Designee, who can only be voter's immediate family or legal guardian, making request on behalf of voter	Char (99)
DesigneeNamePickup	Designee, who may be someone other than immediate family, picking up ballot for voter	Char (99)
Voter FLDL/StateID	Y = information was provided; N = information was not provided **Note**: This value can come from MBRS or the ID type selection on the Vote By Mail Request or Maintain Requester Information dialog.	Char (1)
VoterSSN4	Y = information was provided; N = information was not provided **Note**: This value can come from MBRS or the ID type selection on the Vote By Mail Request or Maintain Requester Information dialog.	Char (1)

Note: The absentee request status S denotes voters who have a standing request, while R denotes voters who requested a ballot for this election only. When Vote-By-Mail requests are generated for all elections voters, all S voters who are eligible to vote in the election will subsequently appear twice in the Vote-By-Mail Ballot Request Information File: once with the S status and again with the R status. Any all-elections/FPCA voters who are not

eligible to vote in the election with only be listed once—with the S status. Those voters will not be listed again with an R status, since they will not receive a ballot.

Note: In order for the requests status *N—No signature* to be reported in the Vote-By-Mail Ballot Request Information File for no signature referrals, the option **"No Signature" Reason** must be selected in System Codes **> Vote-By-Mail Referral Reasons** for every no signature referral reason.

- **Early Voting Voters List**—Lists county voters who have early voted in an election to date. This file is automatically created and sent to FVRS daily beginning the first day of early voting and for three days after the end of early voting. If multiple elections have early voting in progress on a given day, a separate file for each election is sent to FVRS. A copy of each file sent to the state is placed in \Vr6Sharedbinaries\FVRSUpload. The file name is *<county ID>*_EVL_*<FVRS election number>*_*<date of run>*_*<time of run>*.

  Contents of the file, reading left to right:

County ID	FVRS Election number	Election date
Election name	Voter registration ID	Voter name
Precinct	Party	Voter's early voting location
Date voter early voted		

Voting History File

EViD Get Out the Vote Report

3773 Commonwealth Boulevard • Tallahassee, FL 32303 • 850-668-2838 • 850-668-3193

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EXHIBIT F:

VR Systems: "How to Process Received Mail Ballot Requests"

Process Mail Ballot Requests Received

Vote-by-mail requests submitted via the Mail Ballot Request Service are sent to the Web Vote-by-Mail Request Queue in Voter Focus. This eliminates the need to rekey the information from the request forms into voter records. All that's required is to check the web request and give Voter Focus the go-ahead to insert it into the voter's record.

> **Note:** Mail ballot requests that require the voter to complete an affidavit because they chose to have the mail ballot delivered to a new address that is not currently on file with FVRS do not appear in the Web Vote-by-Mail Request Queue in Voter Focus to prevent premature data-entry.

Your county will also receive an email for each voter who has submitted a mail ballot request online. An email is not sent if the voter is required to complete an affidavit.

The email address submitted by the voter will be stored in the **E-Mail** field on the voter's **Vote-by-Mail** tab, replacing any previously entered email address. (These emails are not considered public record.)

For a list of the voters who have submitted web requests that have not yet been processed, run the Pending Web Absentee Requests report.

Processing a request from the website creates an entry on the voter's **Comms** tab called **Web Absentee Request**. Double-click this entry to see a summary of the request on the **View Web Absentee Request** dialog.

> **Note:** An entry is not made on the voter's Comms tab if the voter is required to complete an affidavit.

For more information about the processing of web requests, see Process Vote-by-Mail Requests Submitted on Your Website in the Voter Focus Help system.

For mail ballot requests that required an affidavit to returned, when the affidavit is received by your office, you can manually enter the vote-by-mail request. For more information see the following topics in the Voter Focus help system:

- Mail Ballot Request for a Specific Election
- Mail Ballot Request for All Elections
- Mail Ballot Request for Several Elections

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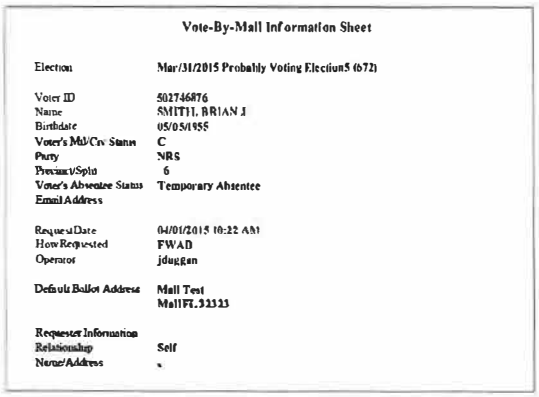
Vote-By-Mail Information Sheet

You have the option of printing this document when processing a Vote-By-Mail request or an in-office or pickup absentee from the Vote-By-Mail Request and Voting Election dialogs. The sheet prints to your default printer.



Vote-By-Mail Information Sheet

Election	Mar/31/2015 Probably Voting Election5 (672)
Voter ID	502746876
Name	SMITH, BRIAN J
Birthdate	05/05/1955
Voter's Mil/Civ Status	C
Party	NRS
Precinct/Split	6
Voter's Absentee Status	Temporary Absentee
Email Address	
Request Date	04/01/2015 10:22 AM
How Requested	FWAD
Operator	jduggan
Default Ballot Address	Mail Test Mail FL 32323
Requester Information	
Relationship	Self
Name/Address	

Print

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EXHIBIT G:

Second District Court of Appeal Judge Roster

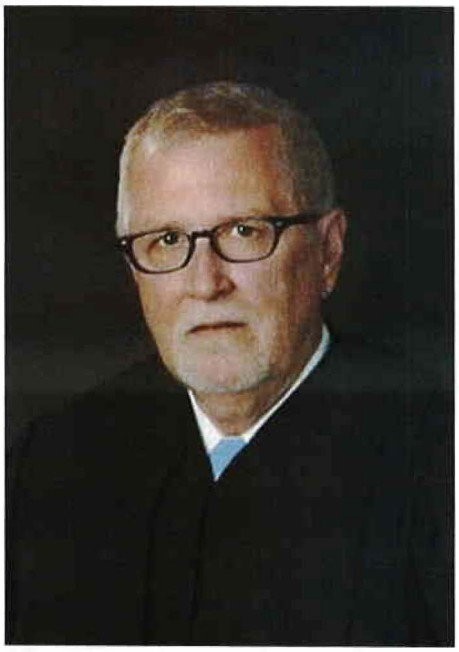
FLORIDA
SECOND DISTRICT COURT OF APPEAL

ACCESSIBLE | FAIR | EFFECTIVE | RESPONSIVE | ACCOUNTABLE

Second District Court of Appeal Judges

For more information about a judge, click on the judge's name.

Chief Judge Daniel H. Sleet
Years of Service: 2012 - Present



Judge Stevan T. Northcutt

Years of Service: 1997 - Present

Judge Morris Silberman

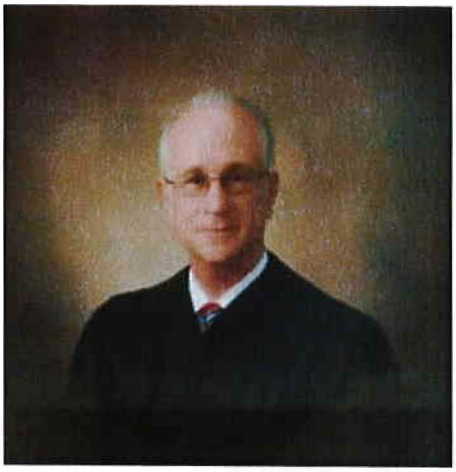
Years of Service: 2001 - Present

Judge Patricia J. Kelly
Years of Service: 2001 - Present

Judge Craig C. Villanti
Years of Service: 2003 - Present

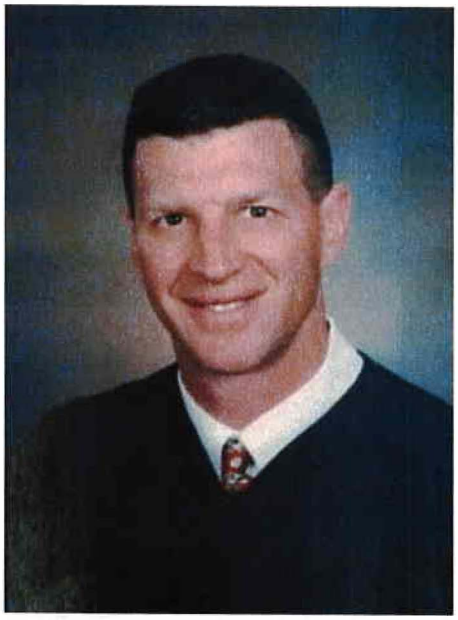
Judge Edward C. LaRose
Years of Service: 2005 - Present

Judge Nelly Khouzam
Years of Service: 2008 - Present



Judge Robert Morris

Years of Service: 2009 - Present



Judge Anthony K. Black

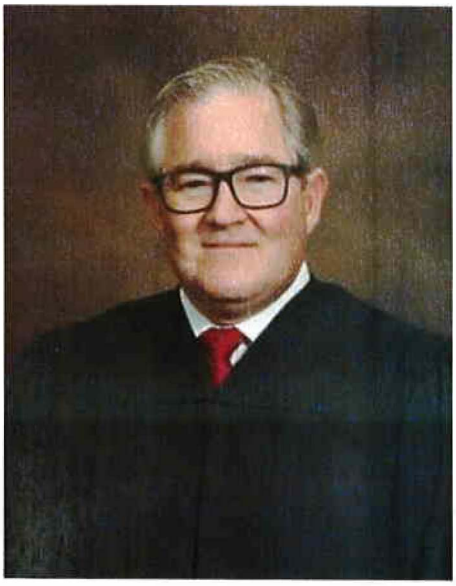
Years of Service: 2010 - Present

Judge Matthew C. Lucas

Years of Service: 2014 - Present

Judge Susan H. Rothstein-Youakim

Years of Service: 2016 - Present



Judge J. Andrew Atkinson

Years of Service: 2018 - Present

Judge Andrea Teves Smith

Years of Service: 2019 - Present

Judge Suzanne Labrit
Years of Service: 2020 - Present

Judge Anne-Leigh Gaylord Moe
Years of Service: 2025 - Present

Judges

Chief Judge Daniel H. Sleet

Judge Stevan T. Northcutt

Judge Morris Silberman

Judge Patricia J. Kelly

Judge Craig C. Villanti

Judge Edward C. LaRose

Judge Nelly Khouzam

Judge Robert Morris

Judge Anthony K. Black

Judge Matthew C. Lucas

Judge Susan H. Rothstein-Youakim

Judge J. Andrew Atkinson

Judge Andrea Teves Smith

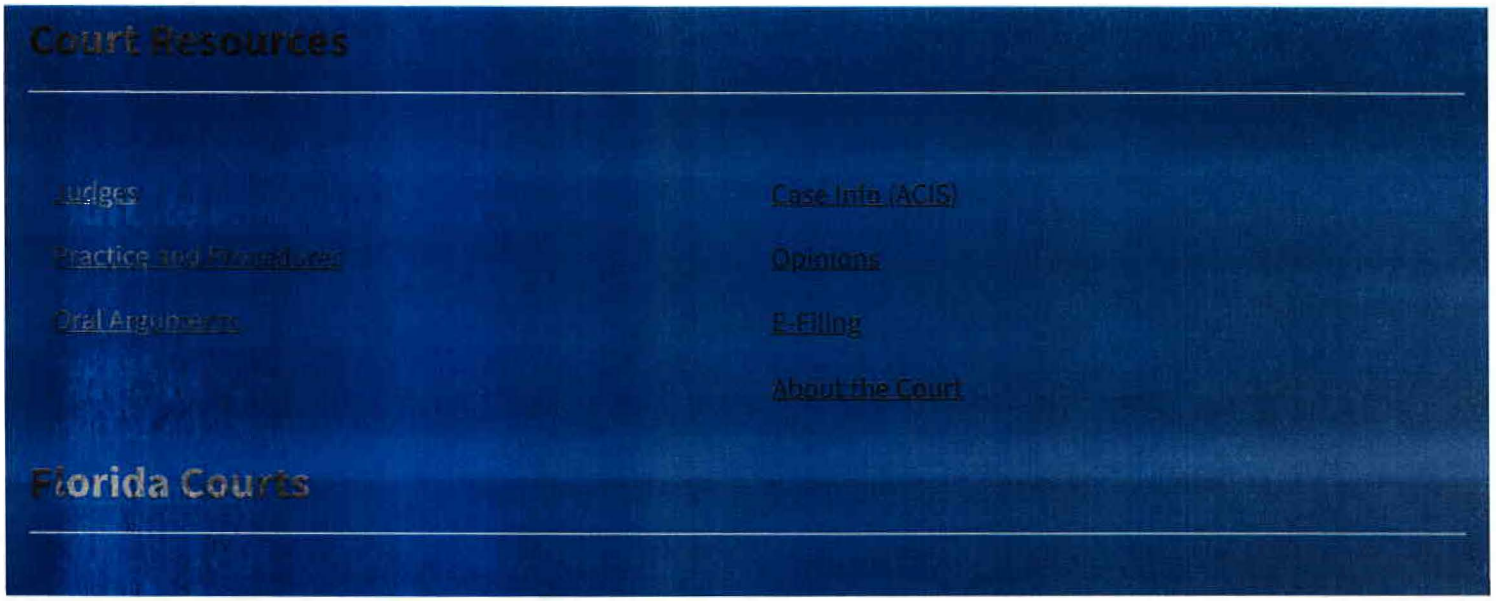
Judge Suzanne Labrit

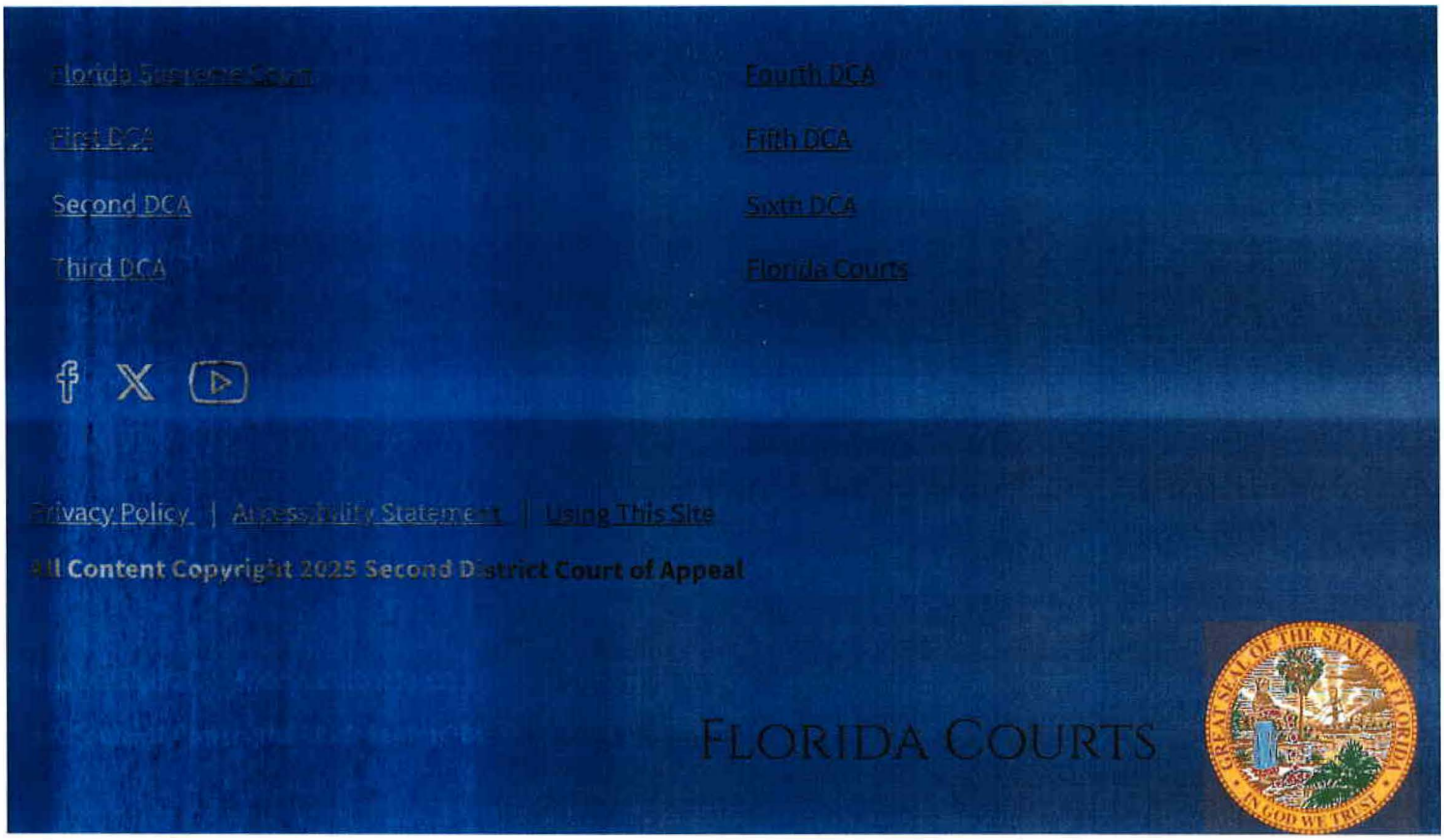
Judge Anne-Leigh Gaylord Moe

Former Judges

Current Judges

View a larger version of the photo




Florida Supreme Court
First DCA
Second DCA
Third DCA
Fourth DCA
Fifth DCA
Sixth DCA
Florida Courts
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FLORIDA COURTS

EXHIBIT H:

Affidavit of John Siamus (April 7, 2025)

AFFIDAVIT OF JOHN SIAMAS

REGARDING CHAIN OF CUSTODY FOR STATEWIDE VOTE BY MAIL

REPORTS AND THE IRREGULARITES OBSERVED WITH THE DATA

STATE OF FLORIDA)
) ss:
COUNTY OF PINELLAS)

Before me, the undersigned authority, personally appeared John Siamas, who, being duly sworn, states as follows:

Affiant's Identity

1. I, John Siamas, was a Republican candidate for the Florida State Sente District 21 Primary Election held on August 20th, 2024. I am over 18 and competent to make this affidavit and have personal knowledge of the facts stated herein.

Purpose of Affidavit:

2. This affidavit is made to establish the chain of custody for the Statewide Vote-By-Mail Report ("VBM") that I obtained directly from the Florida Division of Elections at the following url:

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports

Acquisition of Voting List:

3. I personally accessed the Florida Division of Elections secure online system for authorized individuals as clearly stated in FL Stat 101.62 and FAC 1S-2.043. I used the following secure URL

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports

provided to me by the Division of Elections to download the daily updates of the Statewide Vote-By-Mail Early Voting List.

Secure Download Process:

4. The Florida Division of Elections provided me access to the Voting List via the following secure link

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports ,

which required my unique login credentials provided by the Division. These credentials were assigned specifically for my use as a registered recipient of the Voting List after directly registering with the State at the following url:

https://countyballotfiles.floridados.gov/Account/Register

Receipt of Voting List:

5. Upon logging into the secure platform, I downloaded the Vote-By-Mail report, which was provided in .txt and/or .zip format. I saved the downloaded files directly to my computer under secure conditions, ensuring that the data was not altered.

Handling and Storage:

6. After downloading the Vote-By-Mail report, I took immediate steps to preserve the integrity of the data. The files were securely stored on my computer, which is protected by encryption and password protection. No unauthorized individuals had access to the Voting List from the time I downloaded it until it was submitted in connection with this case.

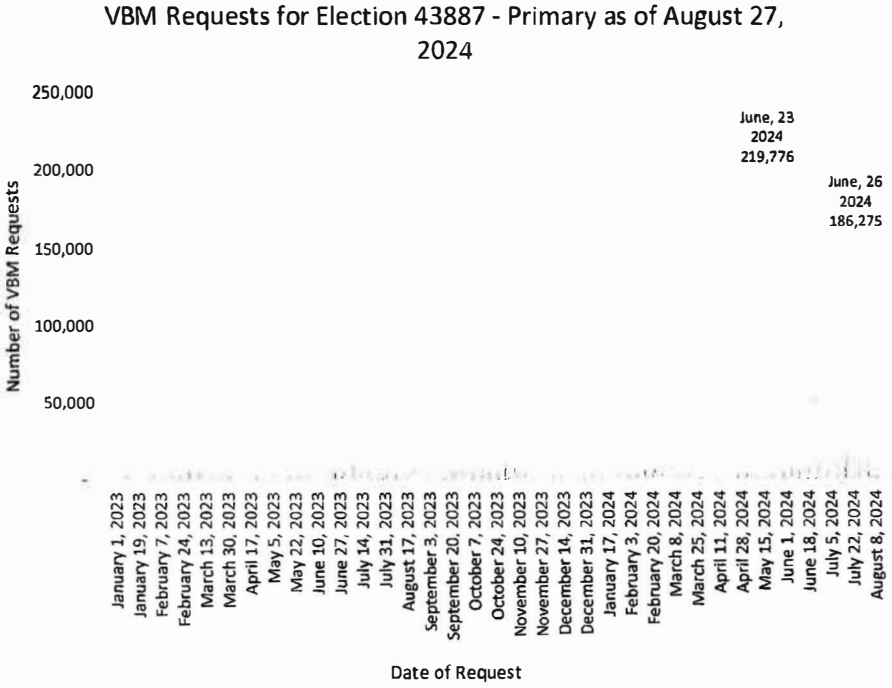
Integrity of the Data:

7. I affirm that the Voting List downloaded from the Florida Division of Elections has not been altered, modified, or tampered with in any way. The files I obtained are in the same condition as when I downloaded them directly from the Division's secure platform.

Irregularities and Anomalies with the Vote-By-Mail Ballots

8. Here are the following anomalies and irregularities in the vote-by-mail ballots and the system implemented to administer the vote-by-mail ballots:

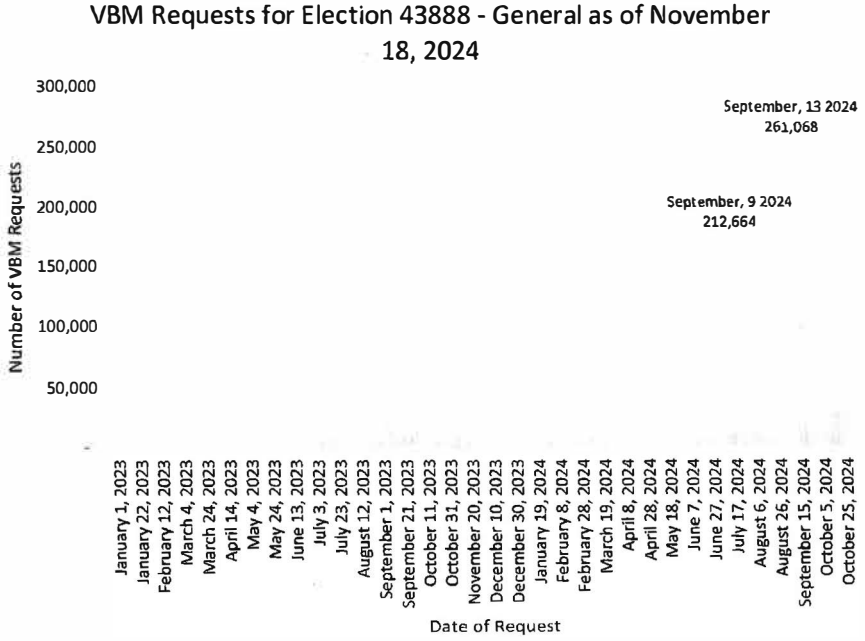
(1) When observing the vote-by-mail ballot (VBM) request data as of August 27, 2024, provided by the Florida Division of Elections for the primary elections, I noticed two very unusual outliers in the requests made. Here is a visualization of the daily requests made across the entire state in 2024:



(2) The two extreme outliers represent two dates, Sunday June 23, 2024, and Wednesday June 26, 2024. The number of vote-by-mail ballot requests made on June 23, 2024, was 219,776. The number of vote-by-mail ballot requests made on Wednesday June 26, 2024, was 186,275. The following is a factual analysis of these anomaly for the county of Pinellas:

a. On Sunday June 23, 2024, of the total 219,779 vote-by-mail ballot requests made, 219,675 vote-by-mail ballots requested were made from the Pinellas County Supervisor of Elections office. Of those 219,675 vote-by-mail requests from Pinellas County, according to the VBM Report dated August 27, 2024, provided by the State, 219,628 (99%) did not provide a Driver's License or Last 4 of SSN as part of the request. This is indicated by a "N" designator in the columns for the "FLDL/StatelD" and "VoterSSN4" in the report.

(3) When observing the vote-by-mail ballot (VBM) request data as of November 18, 2024, provided by the Florida Division of Elections for the general elections, I again noticed two very unusual outliers in the requests made. Here is a visualization of the daily requests made across the entire state in 2024:



(4) A The two extreme outliers represent two dates, Monday September 09, 2024, and Friday September 13, 2024. The number of vote-by-mail ballot requests made on September 09, 2024, was 212,664. The number of vote-by-mail ballot requests made on September 13, 2024, was 261,068. The following is a factual analysis of this anomaly for the county of Pinellas:

a. On Monday September 09, 2024, of the total 212,664 vote-by-mail ballot requests made, 196,037 vote-by-mail ballots requested were made from the Pinellas County Supervisor of Elections office. Of those 196,037 vote-by-mail requests from Pinellas County, according to the VBM Report dated November 18, 2024, provided by the State, 195,280 (99%) did not provide a Driver's License or Last 4 of SSN as part of the request. This is indicated by a "N" designator in the columns for the "FLDL/StatelD" and "VoterSSN4" in the report.

9. The following is a list of Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in both the Primary and General Elections per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judge	Campbell, Kim	107167732
Pinellas 6th Circuit Judge	Campbell, Pamela A	106758700
Pinellas 6th Circuit Judge	Coleman, Sherwood	106876672
Pinellas 6th Circuit Judge	Gnage, Brian	107285314
Pinellas 6th Circuit Judge	Handsel, Mary M.	106814594
Pinellas 6th Circuit Judge	Jirotka, George M.	106817396
Pinellas 6th Circuit Judge	Loar, Doneene	107338189

Pinellas 6th Circuit Judge	Matthey, Philippe	107385240
Pinellas 6th Circuit Judge	Moore, Patrice	106958587
Pinellas 6th Circuit Judge	Muscarella, Patricia A	106784723
Pinellas 6th Circuit Judge	Newton, Cynthia J	107071107
Pinellas 6th Circuit Judge	Ramsberger, Thomas M	107143704
Pinellas 6th Circuit Judge	Riba, Joshua	106991733
Pinellas 6th Circuit Judge	Siracusa, Pat	106772419
Pinellas 6th Circuit Judge	Todd, Kimberly	106869683
Pinellas 6th Circuit Judge	Westine, Lauralee G	106972664
Pinellas 6th Circuit Judge	Helinger, Jack	114340336

10. The following is a list of Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judge	Federico, Philip J.	106986554
Pinellas 6th Circuit Judge	Pearlman, Nicole	100554220
Pinellas 6th Circuit Judge	Stearns, James R	106750878
Pinellas 6th Circuit Judge	Williams, Amy M	106715884

11. The following is a list of Judicial Assistants for Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in both the Primary and General Elections per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judge Judicial Assistant for Judge Steve Berlin	Vincent, Melinda	106873482
Pinellas 6th Circuit Judge Judicial Assistant for Judge Kim Campbell	Hughes, Cyndi	106941212
Pinellas 6th Circuit Judge Judicial Assistant for Judge Pamela Campbell	Miele, Joann	106945217
Pinellas 6th Circuit Judge Judicial Assistant for Judge Elizabeth Jack	Leis, Amber	117384460
Pinellas 6th Circuit Judge Judicial Assistant for Judge Philip J. Federico	Psenisky, Jill	106978328
Pinellas 6th Circuit Judge Judicial Assistant for Judge Jack Hellinger	Scholl, Mary	107176725
Pinellas 6th Circuit Judge Judicial Assistant for Judge Patricia Moore	Trosky, Raelynn	107145889
Pinellas 6th Circuit Judge Judicial Assistant for Judge Shawn Crane	Smith, Louise	125032393
Pinellas 6th Circuit Judge Judicial Assistant for Judge Daniel D Diskey	Debi McCarty	107067204
Pinellas 6th Circuit Judge Judicial Assistant for Judge David Ellis	Wisman, Stacy	107118442
Pinellas 6th Circuit Judge Judicial Assistant for Judge George M Jirkota	Whitehall, Bonnie	124912657
Pinellas 6th Circuit Judge Judicial Assistant for Judge Thomas M Ramsberger	McGivern, Valerie	106981943
Pinellas 6th Circuit Judge Judicial Assistant for Judge Julie L Sercus	Rayburn, Jess	113659838

12. The following is a list of Judicial Assistants for Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State:

Title	Name	Voter ID
Pinellas 6th Circuit Judge Judicial Assistant for Judge Joseph Bulone	Nguyen, Annie	107054797

13. The following is a list of Relatives to the Judges of the Sixth Judicial Circuit of Florida who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Relative of Judge Julie L Sercus	SERCUS, ELIZABETH A	123610805
Relative of Judge Julie L Sercus	SERCUS, FAITH A	111895803

14. The following is a list of County Judges of the Sixth Judicial Circuit of Florida and their Assistants, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Pinellas 6th Circuit Judicial County Judge	Carassas, John	106835464
Pinellas 6th Circuit Judicial County Judge	Jagger, Edwin	106832762
Pinellas 6th Circuit Judicial County Judge	Pierce, James	106815101
Pinellas 6th County Judicial Assistant for Judge Edwin Jagger	Hall, Michelle	106720023

Pinellas 6th County Judicial Assistant for Judge Theodora Komninos	Masterson, Vicki	107150747
Pinellas 6th County Judicial Assistant for Judge Kelly Lorraine	Caffentzis, Joan	106926631
Pinellas 6th County Judicial Assistant for Judge Cathy McKyton	Nierengarten, Cheryl	107033524

15. The following is a list of the Florida Second District Court of Appeal Judges and their relatives, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
2nd DCA	Silberman, Morris	106869196
2nd DCA	Villanti, Craig C	113787369
2nd DCA	Khouzam, Nelly	106723453
Relative of Judge Matthew C Lucas of the 2ND DCA	Lucas, Cheryl L	107285166
Relative of Judge Susan H Rothstein-Youakim of the 2ND DCA	Rothstein, Rita M	122458841
Relative of Judge Susan H Rothstein-Youakim of the 2ND DCA	Rothstein, Arthur S	122246266

16. The following is a list of the Florida Supreme Court Judges, their assistants, and their relatives, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Supreme Court of Florida	Couriel, John D	117954867
Judicial Assistant to Supreme Court Judge Charles Canady	Williams, Brenda	109108119
Relative of Judge Jorge Labarga	Labarga, Maria A	110265650

17. The following is a list of Senior Assistant Pinellas County Attorneys in Pinellas County, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Senior Assistant Pinellas County Attorney	Sadowsky, David	106906875
Senior Assistant Pinellas County Attorney	Sanzeri, Carole	106790228
Senior Assistant Pinellas County Attorney	Schaefer, John	106839614
Senior Assistant Pinellas County Attorney	Ester, Jason	107005833
Senior Assistant Pinellas County Attorney	LeBlanc, Christina	107056302
Senior Assistant Pinellas County Attorney	Morrissey, Joseph	125661447
Senior Assistant Pinellas County Attorney	Steg, Betsy	106931757

18. The following is a list of Assistant County Attorneys and County Attorneys in Pinellas County, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM

Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Assistant County Attorney	Barrera, David	118419022
Assistant County Attorney	Kahn, Jared	111191787
Assistant County Attorney	Klein, Jeffrey	106650848
Assistant County Attorney	Lewis, Kelly	125247381

Title	Name	Voter ID
County Attorney	White, Maria	107153397

19. The following is a list of State Attorney for the Sixth Judicial Circuit of Florida Pinellas County and their relatives, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	Bruce, Robert	107387209
State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	Williams, Emily	107417811
Division Directory for the Sixth Judicial Circuit of Florida Pinellas County	Sullivan, Courtney	117723880
Division Directory for the Sixth Judicial Circuit of Florida Pinellas County	Koskinas, Thomas	107203473
Division Directory for the Sixth Judicial Circuit of Florida Pinellas County	Hill, Karen	106808845
State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	Festa, Noelle	107125137

Relative of Nathan Vonderheide State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	VONDERHEIDE, EMILY A	119836062
Relative of Noelle Festa State Attorney for the Sixth Judicial Circuit of Florida Pinellas County	FESTA, THOMAS V	114538517

20. The following is a list of other significant individuals, who appear in both reports, made vote-by-mail requests on both Sunday June, 23, 2024 for the Primary Election and Monday September 9, 2024 for the General Election, and DID NOT provide a Driver's License or Last 4 of SSN as part of the request, as indicated in the VBM Reports provided by the Department of State, and were marked as having voted in the General Election per the VBM Reports:

Title	Name	Voter ID
Relative of Pinellas County Sheriff Robert Gualtiere, Judge Lauralee G Westine	WESTINE, LAURALEE G	106972664
Supervisor of Election Pinellas County	Marcus, Julie	107075643
County Commissioner on Canvassing Board	POLSON, HERBERT E	106735562
County Commissioner on Canvassing Board	PETERS, KATHLEEN M	106894092

[AFFIANT SIGNATURE]

Sworn to and subscribed before me by means of X physical presence or _____ online notarization, this 7th day of April 2025 John Siamas

Notary Public – State of Florida

Notary Public State of Florida
Ethan Weaver
My Commission HH 432294
Expires 8/10/2027

Ethan Weaver
[PRINT, TYPE, OR STAMP NAME OF NOTARY PUBLIC]

Personally Known _____ OR Produced Identification X [CHECK ONE]

[Type of Identification Produced: [COMPLETE ONLY IF NOTARY REQUESTED IDENTIFICATION]] FL DL

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Google Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Select Language

Powered by Google Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Last Name:

Siamas

Date of Birth:

[redacted]

House Number of Voter's Residence Address:

[redacted]

Last Four Digits of SSN:

[redacted]

OR

Driver's License (or State ID) Number:

[redacted]

Search

Back

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email: Election@VotePinellas.gov (mailto:election@votepinellas.gov) | Public Records Request Form (/General-Information/Contact-Us/Public-Record-Request)**

P:(727) 464-VOTE (8683) • F:(727) 464-6239

Election Service Center
13001 Starkey Rd.
Largo, FL 33773
(Starkey Lakes Corporate Center)

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

County Building
501 First Avenue North
St. Petersburg, FL 33701
(Fifth Street North Entrance)

F.S. 668.6076 Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. To submit a public records request, use this form. (/General-Information/Contact-Us/Public-Record-Request)

EXHIBIT I:

VR Systems Manual: “Dialog: Vote-By-Mail Request”

Vote-By-Mail Request

To access: **VOTER REGISTRATION > Voter Maintenance > {*voter*} > Vote-By-Mail** tab **> New Request** or **All Elections** or **Federal Post Card App**

or

Vote-By-Mail > Vote-By-Mail Request > {voter}

On the **Vote-By-Mail Request** dialog you can:

Record a voter's request(s) for mail ballots.

Maintain addresses where mail ballots are to be sent.

The "state" of this dialog depends on whether you are making a single request, an all-elections request, an FPCA request, or a request for all elections through a specific date range. The type is shown in the **Request Type** box and, in the case of the All Elections and FPCA types, all elections for which the voter is eligible will be selected. For a single request or a request for several specific elections, you will need to select the **Request** field for each election where the voter wants a mail ballot.

The box in the center of the dialog lists the elections whose status is Open, Active, or Return Processing Only, showing the voter's Vote-By-Mail status for each election. A blank status indicates the voter is eligible to vote in the election but has not requested a mail ballot. When you first access the dialog, the requests are sorted by election date with the most future election first. To sort by another criterion, click the column heading of the column you want to sort by.

The buttons in the **Change Address** column let you add a default ballot address (if used by your county) or a Ballot Address for This Election. Double-click an **Add Address** or **Change Address** button to open the Vote-By-Mail Addresses dialog where you can add or update an address. Note that if you change the Default Ballot Address for one request, it changes this address for all requests. The Ballot Address for This Election is for the selected request only.

Fields and Controls on this Dialog

Save — Saves the request without printing an address label or Vote-By-Mail Information Sheet. If you want to print these documents, click **Save and Print** instead.

Save and Print — Saves the request and prints a Vote-By-Mail Information Sheet to your default printer. You can use this document to verify the correct information was entered into the database. Some counties attach the sheet to the Vote-By-Mail Request, if a paper request is available.

If the **How Requested** field is a pick-up value (Pick-up or 3rdParty) and your Voter Focus system is set up for printing labels (**VOTER FOCUS ADMIN > System Options > Vote By Mail > Vote-By-Mail Label Options**), clicking **Save and Print** also prints an address label with a bar code to your label printer. You can affix the label to the return envelope.

Utilities > Local Printer Options — Opens the Local Printer Options dialog where you can select a label printer and page printer for your workstation.

Default Ballot Address — Opens the Vote-By-Mail Addresses dialog where you can enter addresses to which ballots should be sent other than the voter's mailing or residence address.

Vote-By-Mail Status

Permanent—A voter who is expected to Vote By Mail indefinitely. This status is typically used for voters who have asked to receive the annual Notice of Elections each year.

This status allows voters to request mail ballots for all or select elections held through the end of the calendar year of the next regularly scheduled general election.

Temporary—A voter who wants to Vote By Mail in one or more elections but who has not asked to receive the annual Notice of Elections. The Voter Focus administrator has the option of resetting the absentee status of Temporary voters to Cancelled at the end of an election year. (See Clear Temporary Vote-By-Mail Statuses.)

Cancelled (or no status selected)—The voter has no mail ballot requests in their record.

FPCA Applicant—A mail ballot voter who has requested ballots using the Federal Post Card Application form. The FPCA form allows military voters, their dependents, and civilian voters residing outside the United States to make a single request for mail ballots through the end of the calendar year of the next regularly scheduled general election held after the request date unless the voter indicates a shorter time period or a specific election in which they want to vote.

Note:

An upcoming general election is not considered the *next general election* if the all elections request is submitted after 5:00 pm of the 6th day prior to the upcoming election date.

The voter's *FPCA Applicant* status does not remain in their voter registration record should they change their residence to another county. If the voter wants to maintain FPCA status, they will need to submit another FPCA form to the elections office in their new county.

The *FPCA Applicant* status reverts to a blank status when the FPCA request expires at the end of the calendar year.

Comment — A 25-character field for user notes. Should you need more space than the 25 characters provided, type *See Communication Log* in the **Comment** field. Then go to the voter's record and create an office note.

Some counties use this field to record the voter's phone number when the voter has asked that the number not be included in their voter registration record. In such cases, the phone number is omitted from the **Telephone** field on the voter's **Maint** tab and entered into the **Comment** field on the Vote-By-Mail Request dialog, which is not public record.

E-Mail If the voter provided an email address, enter it here. The system will attempt to validate the email address by verifying it contains proper syntax, such as an @ sign before the domain name. This doesn't guarantee that the email address is valid, but it will identify those that cannot be mailed by your SMTP server.

If the voter submits a mail ballot request through your website, when the request is processed, the email address submitted by the voter will be stored automatically in this field, replacing any previously entered email address.

The email address entered here will be used by the Email run for voters requesting delivery of their ballot by email. It will also be used for the Vote-By-Mail notification runs and list-of-candidate runs.

You can create an email message from yourself to the voter by holding down the Ctrl key on your keyboard and clicking the email address. This feature requires that your workstation have an email client such as Microsoft Outlook installed. Web based email systems are not supported for these "one-off" emails.

Email addresses are reported in the reports Absentee Status for all Absentee Voters, Absentee Status for Email/Fax Delivery Voters, and the Unsent Email/Fax Absentee Ballots.

> **Note:** Voter email addresses can be made available to candidates and political parties, but they are exempt from public records requests by other entities. When creating a report or export file in response to a public records request, you should remove the email addresses from the report/export file before releasing it to the requestee.

Military Select this check box to turn on the military setting for this voter. The military setting is used for reporting purposes; it does not ensure that the voter will be included in early batches of mail ballots sent to overseas voters. To be included in the early overseas batch, the voter's Vote-By-Mail address must be set up a particular way for overseas. See Addresses_for_Overseas_Voters for more information.

If you change this setting, all requests made after the change will have the new setting, but requests made prior to the change will retain the old setting. In the voter's registration record, the **Military** setting can be changed for an individual mail ballot request, without affecting the setting here. See Mail-Ballot Adjustments for more information.

Mil Dep Select this check box to turn on the military dependent setting for this voter. Voters with the military dependent setting are treated the same as military voters; that is, they are included in the mailing lists and report totals of military voters. Note that both military settings (**Military** and **Mil Dep**) cannot be selected; you must choose one or the other.

Supervised Voting The voter resides at an assisted living or similar facility, wants their Vote-By-Mail ballots delivered to the facility, and needs supervised voting at their facility.

Request Type The value here depends on how you accessed this dialog, whether a new (single) request, an all-elections request, or an FPCA request.

Single Election—You can record a request for one or more specific elections by checking the **Request** check box for the election(s).

All Elections or **FPCA**—Automatically selects the **Request** check boxes for all elections listed for which the voter is eligible and enters a date in the **Expiration of All Elections** year field. If the voter does not wish to vote in a specific election, you can clear the **Request** check box for that election.

Note:

Should the voter move to another Florida county prior to the expiration date of their all-elections or FPCA request, the request will not move with their voter record. The voter will need to make another all-elections or FPCA request in their new county.

If a voter previously made an all-elections or FPCA request, processing undeliverable mail with no change of address or an out-of-state address automatically triggers the cancellation of any outstanding requests for future elections (unless a ballot has already been delivered), sets the expiration date of the all-elections/FPCA request to today's date, and schedules a Canceled Requests Notice to be sent to the voter.

Expiration of All Elections The field indicating the expiration year defaults to the end of the calendar year in which the second regularly scheduled general election after the request date occurs. For example, if a voter makes an all-elections request in July 2010, the request will expire on Dec. 31, 2012. The year can be changed to an earlier date if the user requests a shorter time period for receiving mail ballots. It can also be changed to a later date that is no later than two years of the default expiration date.

This field will be cleared and become uneditable if you deselect the **Request** check box for an election and the voter is not an FPCA voter.

Request Status Indicates the current status of each request. Possible statuses include:

Vote-By-Mail option not set for this election—The election has not been set up for mail ballots. (This is done in **ELECTIONS > Maintain Election Settings > Election Maintenance > Vote-By-Mail Requests**.)

Already Requested—If the voter already has a Vote-By-Mail Request for this election.

Election is After the Next General—If the election occurs after the end of the calendar year of the second general election, which will be after the all-elections or FPCA request has expired.

Request Cancelled—If the voter cancels their previous request for a specific election

Voter not in the city—If the voter does not reside in the city where a city election is scheduled.

Voter's party not voting—If the election is a primary and the voter's party is running no candidates.

Voter's precinct not voting—If the voter's precinct is not voting in the election.

Change Address/Add Address Click to open the Vote-By-Mail Addresses dialog where you can enter a default ballot address for all elections (if you county permits this type of address) or a Ballot Address for this Election.

Request Select to record a Vote-By-Mail Request for specific elections.

Print Request Select to print a Vote-By-Mail Information Sheet when you save the dialog.

Voter Record Verification Info The driver's license/state ID number or the last four digits of the Social Security Number from the voter's record.

Requestor Information Use this area to record the requestor's information, whether they are a third party or the voter themself.

After entering the requestor's name and address, in the Relationship field, select one of the available options:

When the request is made by the voter or the ballot is picked up by the voter, this field should show *Self*.

To enter a request from someone other than the voter, the person must be a member of the voter's family (one of the options listed in the field) or their legal guardian.

If someone else picked up a ballot for the voter, you can select from the list or enter something else, such as *Neighbor*.

Important: The State requires that vote by mail ballot requests include the last four digits of the requestor's Social Security Number or the driver's license/state ID number and that the type of ID provided for the voter is indicated. If the requestor is anyone except Self, make sure the Requestor DLN or Requestor Last4SSN field is filled out in addition to the Voter DLN or Voter Last4SSN.

Note: Identifying information for the voter (DLN or Last4SSN) entered here is included in the Vote-By-Mail Ballot Request Information daily file.

How Requested Select the way the voter requested the ballot. The options listed in the drop-down list will depend upon the status of the election:

Open elections—Requests can be made:

Person—In person.

Mail, **Phone**, **Fax**, or **E-Mail**—By mail, phone, fax, or email.

Web—Via the elections office website.

No ballots can be issued while the election status is Open.

Active elections—Requests can be made in the same way as in Open elections. You can also issue mail ballots and receive Federal Write In Absentee Ballots, so these options are added to the list:

Online—Used by counties participating in the Federal Voting Assistance Program (FVAP), which allows UOCAVA voters to request and receive ballots online.

Pick-up—The voter requested and picked up their ballot from the Supervisor's office. Pickup ballots can be issued up to 49 days in advance of the election. If your county uses ballot numbers for pickup voters, when **Pick-up** is selected, the **Ballot Number** field appears so you can enter the number of the ballot issued to the voter. The delivery method is automatically set to **PkUp**.

Note: Ballot printing for pickups and third-party pickups is not supported on this dialog. If your county uses the ballot printing feature, pickups should be processed on the Voting Election dialog.

3rdParty—The ballot was requested and picked up by a third party presenting the voter's signed request that the ballot be given to the third party. If your county uses ballot numbers for pickup voters, when **3rdParty** is selected, the **Ballot Number** field appears so you can enter the number of the ballot issued to the voter. The delivery method is automatically set to **3rdP**.

FWAB—The voter has submitted a Federal Write In Absentee Ballot. Only voters who are absent uniformed service members or citizens residing outside the United States can use this type of ballot.

Return Processing Only elections—Requests for mail ballots can no longer be taken, but ballots can be issued, so the options are Pick-Up, 3rdParty, FWAB and Online.

Requested Delivery Select the delivery method to be used when no delivery method has been specified for a particular election. The delivery method specified for a voters previous Vote-By-Mail Request is selected by default. If this is the first Vote-By-Mail Request for the voter, the default value will be **Mail**.

If the voter wants a different method of delivery for a particular election, the delivery method for that election can be changed on the Mail-Ballot Adjustments dialog, which is accessed from the **Vote-By-Mail** tab in the voter's registration record.

Mail—If the voter provided an address, you will need to enter it on the Vote-By-Mail Addresses dialog. To open this dialog, click the **Add Address** button in the **Change Address** column in the list of elections.

Email—For email delivery, you will need to enter the voter's email address in the **E-Mail** field.

Fax—For fax delivery, you will need to enter the voter's fax number on the Vote-By-Mail Addresses dialog. To open this dialog, click the **Add Address** button in the **Change Address** column in the list of elections.

Accessible Online—When the **How Requested** field is **Online**, the **Requested Delivery** field will be set automatically to **Accessible Online**. This delivery option will only appear for All Elections requests.

Note: Only UOCAVA voters can receive ballots by email, fax, or online. For non-UOCAVA voters, the **Online** option is unavailable.

Date Requested This field displays the current date and time. If the request was received earlier than today, change the date to reflect the actual date you received the request. The date you enter will stick as the default request date for subsequent requests for this voter until you change the date or restart the program. After a restart, this field reverts back to the current date and time.

Issue Ballot If you selected **Pick-up** or **3rdParty** in the **How Requested** field and the election is Active, the **Issue Ballot** box will appear.

How Delivered—If you chose Pick-Up or 3rdParty in the How Requested field, the How Delivered field defaults to Pkup or 3rdP, respectively.

Ballot Number—If your county uses ballot numbers, enter the number here. Entry of a ballot number for faxed or emailed ballots is optional if your county prefers to assign the ballot number after the faxed or emailed ballot has been returned and the votes transposed to an actual ballot.

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Process Mail Ballot Requests Received

Vote-by-mail requests submitted via the Mail Ballot Request Service are sent to the Web Vote-by-Mail Request Queue in Voter Focus. This eliminates the need to rekey the information from the request forms into voter records. All that's required is to check the web request and give Voter Focus the go-ahead to insert it into the voter's record.

> **Note:** Mail ballot requests that require the voter to complete an affidavit because they chose to have the mail ballot delivered to a new address that is not currently on file with FVRS do not appear in the Web Vote-by-Mail Request Queue in Voter Focus to prevent premature data-entry.

Your county will also receive an email for each voter who has submitted a mail ballot request online. An email is not sent if the voter is required to complete an affidavit.

The email address submitted by the voter will be stored in the **E-Mail** field on the voter's **Vote-by-Mail** tab, replacing any previously entered email address. (These emails are not considered public record.)

For a list of the voters who have submitted web requests that have not yet been processed, run the Pending Web Absentee Requests report.

Processing a request from the website creates an entry on the voter's **Comms** tab called **Web Absentee Request**. Double-click this entry to see a summary of the request on the **View Web Absentee Request** dialog.

> **Note:** An entry is not made on the voter's Comms tab if the voter is required to complete an affidavit.

For more information about the processing of web requests, see Process Vote-by-Mail Requests Submitted on Your Website in the Voter Focus Help system.

For mail ballot requests that required an affidavit to returned, when the affidavit is received by your office, you can manually enter the vote-by-mail request. For more information see the following topics in the Voter Focus help system:

- Mail Ballot Request for a Specific Election
- Mail Ballot Request for All Elections
- Mail Ballot Request for Several Elections

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EXHIBIT J:

VR Systems Manual: "About Capturing

Questionable Vote-By-Mail Requests from the Web"

Capturing Questionable Vote-By-Mail Requests from the Web

Voter Focus offers an optional feature to help detect fraudulent Vote-By-Mail requests submitted on your website through the Absentee/Mail Ballot Request Form. The requests are blocked from being processed into voter records, thus preventing the release of mail ballots to those intent upon voter fraud.

To use this feature, you run the Fraud Detection program, which scans requests from a specified time period, looking for those originating from the same IP address or having the same email address for ballot delivery. Requests whose addresses present no issue are passed to the Web Request Queue for processing into voter records. But questionable requests are detained for user review.

During your review, you can release a detained request to the Web Request Queue or you can put an indefinite hold on it. Where an address is known to be legitimate, you can set the Fraud Detection program to pass all requests associated with that address.

The Fraud Detection feature is under **Vote By Mail > Vote-By-Mail Fraud Detection**. To see this feature, your county must have this option selected:

VOTER FOCUS ADMIN > System Options > Vote By Mail > Use Vote-By-Mail Fraud Detection

And the user must have the permission:

VoteByMailFraudDetection

We recommend you run the Fraud Detection program and evaluate its findings on a daily basis.

How Fraud Detection Works

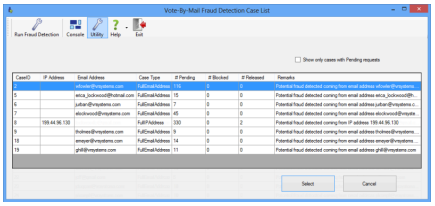
The Fraud Detection program uses these parameters on the Vote-By-Mail Fraud Detection Parameters dialog to determine whether a request should be held for review:

Email Threshold—The number of requests having the same email address at which the program will begin capturing the requests. For example, if the threshold is 5, the program will pass the first four requests with this email address but will detain the fifth and all subsequent requests with this address.

IP Address Threshold—The number of requests having the same IP address at which the program will begin capturing the requests. As with the email threshold, the program will detain any request meeting or exceeding the threshold.

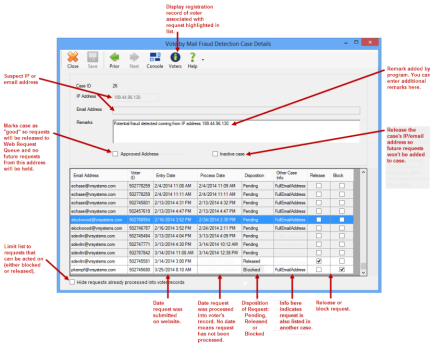
Date of First Web Request to be Analyzed—The date at which the program will begin evaluating web requests. This date must be at least a year in the past. The program will look at all requests submitted on this date and thereafter until today, including those that have already been processed into voter records.

The program checks all requests submitted on the website, beginning with the first request on the start date, placing a hold on any request exceeding the email or IP address threshold, except for those that have already been processed into voter records. It then presents the user with its findings, organized as a list of fraud *cases*, as shown in the screenshot below. Each case contains the web requests exceeding the threshold for a particular IP or email address.



You can then open a case, examine its requests, and make determinations on individual requests within the case or a general determination on the case itself:

- For individual requests, you can either release the request, block it, or leave it pending. A released request goes to the Web Request Queue where it can then be processed into the voter's record by the county user responsible for web request processing. Released requests continue to appear in the case list, as do requests that have been processed. If you don't want to see processed requests, you have the option of hiding them, so you can focus on requests that can still be acted upon.
- For cases where the address is known to be legitimate, you can mark the address as approved, which releases all requests in the case to the Web Request Queue and allows any future requests associated with the address to be passed by the fraud detection program. Approving an address lets you pass requests from known locations, such as public libraries, where voters might use public computers to submit Vote-By-Mail requests.


Display registration record of voter associated with request highlighted in list.
Vote-By-Mail Fraud Detection Case Details
Close
Save
Prior
Next
Console
Voters
Help
Case ID
IP Address
Email Address
Remarks
Approved Address
Inactive case
Suspect IP or email address
Marks case as "good" so requests will be released to Web Request Queue and no future requests from this address will be held.
Remark added by program. You can enter additional remarks here.
Release the case's IP/email address so future requests won't be added to cases.
Limit list to requests that can be acted on (either blocked or released).
Hide requests already processed into voter records
Date request was submitted on website.
Date request was processed into voter record. No date means request has not been processed.
Disposition of Request: Pending, Released, or Blocked
Info here indicates requests also listed in another case.
Release or block request.

Disposition of Requests

Web requests have one of three dispositions:

Pending—For counties using fraud detection, all web requests are assigned this disposition when they come into the Voter Focus system.

Note: For counties not using fraud detection, web requests are automatically assigned the Released disposition when they enter the system. Should a county turn on the fraud detection option, those requests will appear in a case should either of their addresses meet a threshold, but their disposition will remain Released. Should the county turn off fraud detection, the disposition of all web requests will be changed to Released.

Released—This disposition is assigned by the user upon determination that the request is legitimate. It allows the request to enter the Web Request Queue for processing into the voter's record. Requests with the disposition Released will continue to appear in the case, even after they have been processed. If a county does not use fraud detection, all web requests are assigned the disposition Released.

Blocked—This disposition is assigned by the user upon determination that the request is fraudulent. It prevents entry of the request into the Web Request Queue. Should a Blocked request be reevaluated later as legitimate, it can be released by selecting the **Release** check box on the Vote By Mail Fraud Detection Case Details dialog.

If a request appears in more than one case and you change its disposition in one of those cases, the change will be reflected in the other case.

Running the Fraud Detection Program

To run the Fraud Detection program, go to **Vote By Mail > Vote-By-Mail Fraud Detection > Run Fraud Detection**. During the run, if the programs finds new requests matching an existing case, it adds those requests to the case and displays a message indicating how many were added. If the program finds a new address meeting one of the prescribed thresholds, it will ask if you want to create a new case. If you say yes, the new case is added to the list of existing cases on the Vote-By-Mail Fraud Detection Case List dialog. If you say no, the requests associated with the suspect address will still be marked as Pending, even though a case has not been created. On subsequent runs of the program, if the same thresholds are used, you will be asked again if a new case should be created for those requests.

When counting the requests to meet one of the prescribed thresholds, the program does not consider whether a request has already been processed from the Web Request Queue into a voter's record. The first requests from an IP or email address that do not meet the threshold will not be stopped by the Fraud Detection program, so it is possible that a new case will contain requests that have already been processed, delivered, and perhaps even voted. (The same is true for requests processed before the county began using the fraud detection facility.) These requests cannot be "pulled back" or otherwise blocked by the Fraud Detection program.

The program does not evaluate the election for which a request is being made; requests for different elections can appear in a single case.

An all-elections request is considered a single request for the purpose of the Fraud Detection program.

Approving "Good" Addresses

In situations where an IP or email address is from a known legitimate source, you can mark the address as approved. This releases all requests in the case to the Web Request Queue unless a request appears in another case where the address is not approved. Approving an address allows any future requests associated with the address to be passed by the Fraud Detection program. To identify a case as good, select **Approved Address** on the Vote-By-Mail Fraud Detection Case Details dialog.

Note that if you select **Approved Address** and then clear this check box, the disposition of individual requests in the case will be reset to the settings in the last saved version of the case.

Making a Case Inactive

A case can be made inactive, which releases the once questionable IP or email address so that future requests with the address will be passed by the Fraud Detection program. This allows for situations where an internet service provider dynamically assigns a previously questionable IP address to a new, presumably legitimate location.

If you inactivate a case—by selecting **Inactive Case** and clicking **Save** on the Vote By Mail Fraud Detection Case Details dialog—the disposition of any requests in the case is essentially frozen. Inactive cases do not appear on the Vote-By-Mail Fraud Detection Case List, so the case itself can no longer be viewed and the disposition of requests in the case cannot be changed, unless they happen to appear in other, still active, cases.

Fraud Detection Reports

- Active Cases in Vote-By-Mail Fraud Detection
- Approved Addresses in Vote-By-Mail Fraud Detection
- Blocked Requests in Vote-By-Mail Fraud Detection
- Inactive Cases in Vote-By-Mail Fraud Detection
- Questionable Web Requests for an Election

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Vote-By-Mail Flexible Report

To access: **REPORTING > Reports > Vote-By-Mail Reports > Vote-By-Mail Voter Lists > Vote-By-Mail Flexible Report**

You can create reports tailored to your specific needs by selecting from mail ballot-related criteria on this dialog. Refer to the following topics for some examples of how the Vote-By-Mail Flexible report can be run:

Absentee Status for All Absentee Voters

Absentee Status for Domestic Voters

Absentee Status for Email/Fax-Delivery Voters

Absentee Status for Military & Civilian Overseas Voters

Unsent Email/Fax Absentee Ballots

FWAB Ballots Received

> **Note:** Protected voter addresses are not included in any report produced from this dialog.

Fields and Controls on this Dialog

Output Format	**Status Report**—Produces an onscreen report in Crystal Report format. **Vote-By-Mail Status Export**—Produces a file in either TXT or XLS format. The report lists voters meeting the criteria specified for the report run. **Vote-By-Mail Ballot Export**—Produces a file in either TXT or XLS format. The report returns information on mail ballots meeting the criteria specified for the report run. **Note:** The first two options—**Status Report and Vote-By-Mail Status Export**—query the database table where mail-ballot requests are recorded, so you can expect these outputs to return only one entry per voter. If a voter requested a second or third ballot, only the last ballot they requested is reported. The third option— **Vote-By-Mail Ballot Export**—queries the database table where mail ballots are recorded, so there can be multiple entries for a voter if they were sent more than one ballot.
Absentee Status	The status of the ballots reported: • Requested, not Delivered • Delivered, not Returned • Returned • All (requested, delivered, and returned ballots)
Date Selection (Requested, Ballot Delivered, Ballot Returned)	Click **Select Dates** and enter the starting and ending dates of the time period to be reported.
Disposition	*Available only when **Absentee Status** is **Returned**.* Select one of the ballot dispositions (**Accepted**, **Referred**, or **Returned Undeliverable**) or a single referral reason (**Referral Code**).
Location	Select one of the voter categories to report: • Civilian Domestic • Civilian Overseas • Domestic Military • Absent Domestic Military • Military Overseas • UOCAVA (includes Civilian Overseas, Absent Domestic Military, and MilitaryOverseas) • All (includes all Vote-By-Mail voters for the election) The category reported will be the voter's category at the time the ballot was mailed/emailed/faxed to the voter.
Supervised Voters	**Include**—In the report, include supervised voters. **Exclude**—Do not include supervised voters. **Only**—Report only on supervised voters and exclude all other voters.
Delivery Method Requested	Select the ballot delivery method requested by the voter (Accessible Online, Email, Fax, or Mail). Leave this field blank to report on all delivery methods requested.
How Requested	*Not available when **Output Format** is **Vote-By-Mail Ballot Export**.* Select the method by which the voter requested their mail ballot (such as Mail, Phone, Fax, Email, FWAB, FPCA, etc.).

How Delivered	*Not available when **Absentee Status** is **Requested, not Delivered**.* Select the method by which the ballot was delivered to the voter (Accessible Online, Pickup, Fax, Mail, Email, or Third Party).
How Returned	*Available only when **Absentee Status** is **Returned**.* Select the method by which the ballot was returned to the elections office (Mail, Email, Fax, Counter (in-office absentee), and Early Vote). **Note:** Not all of the returned options will be available for elections in the past. The ballot returned field for all ballots was introduced in the 2012 release of Voter Focus. Prior to that, ballot returned data was collected only for overseas ballots. For very old elections, this data was not collected at all.
Include Protected Voters	Include voters with protected addresses in the report.
Party Selection	Click **Select Parties** and select the political party affiliations to be reported. The party reported will be the voter's party at the time the ballot was mailed/emailed/faxed to the voter.
District Selection	Select a district to report from the drop-down list or leave this field blank to report on all districts.
Ballot Style Selection	*Not available when **Absentee Status** is **Requested, not Delivered**.* Click **Select Ballot Styles** to show a list of the permanent ballot styles for this election and select one or more ballot styles to report. To report on all ballot styles, leave this field blank.
Precinct Selection	Click **Select Precincts** to show a list of the precincts voting in this election and select one or more precincts to report. To report on all precincts, leave this field blank. The precinct reported will be the voter's precinct at the time the ballot was mailed/emailed/faxed to the voter.
Print Specification	Click to print a copy of the dialog with your current selections.
OK	Click to run the report with the selected parameters.

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EXHIBIT K:

VR Systems Report: “Questionable Web Requests for an Election”

Questionable Web Requests for an Election

To run: **REPORTING > Reports > Vote-By-Mail Reports > Fraud Detection Reports > Questionable Web Requests for an Election**

This report lists the Vote-By-Mail requests submitted on the county's website that might be fraudulent. It groups requests by matches such as the source IP address, requestors other than the voter, the delivery mailing address, email address, or fax number, and voter ID.

For more information on Vote-By-Mail fraud detection, see About Capturing Questionable Vote-By-Mail Requests from the Web.

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EXHIBIT L:

VR Systems Dialog: “Mail-Ballot Adjustments”

Mail-Ballot Adjustments

To access: **Voter Maintenance > {*voter*} > Vote-By-Mail** tab **> {*election*} > Mail-Ballot Adjustments**

This dialog lets you make various changes an existing mail ballot or early voting request for an election, including:

- Recording when a ballot has been issued and how it was issued.
- Canceling a request for a mail ballot.
- Changing the request from Military to Civilian. This is important because military ballots (Military Overseas and Military Domestic) are mailed out earlier than their civilian counterparts.
- Recording the release of replacement ballots.
- Reversing the release or return of ballots.
- Reversing votes cast during early voting and in-office absentee voting.
- Preventing the return of a mail ballot.
- Changing the delivery method from mail to email or fax.

Adjustments to Vote-By-Mail and early voting requests are automatically reflected in the various Vote-By-Mail and early voting reports. For example, changing the **Mil/Civ** setting affects where the request is listed in the Absentee Totals for an Election report, which lists military and civilian mail ballot voters separately. Changing a voter's delivery from mail to email or fax removes the voter from the Deliver Ballots run and adds them to the Unsent Email/Fax Absentee Ballots report.

See Make Adjustments to Existing Mail-Ballot Requests for specific instruction on adjusting requests under various scenarios.

Certain buttons on the dialog may be disabled based on ballot status or user permission. For example, the **Reverse Return of Ballot** button is disabled if the voter has not returned an issued ballot or cast an early vote.

With the exception of changes to the **Mil/Civ** field, adjustments to a request are immediately recorded in the Voter Focus database and can be seen on the Absentee Activity Dump report as soon as they are made. For instance, if you reverse delivery of a ballot and click **Audit Report**, you can see the reversal, even though you haven't yet saved your changes.

Fields and Controls on this Dialog

Delivery Method	Indicates how the ballot will be delivered. The value defaults to the method requested by the voter when they made the Vote-By-Mail Request, but you can change it to another method if the voter changes their mind. The options here are: **Mail**—For mail delivery, if the voter provided a Vote-By-Mail address, you will need to enter the address on the Vote-By-Mail Addresses dialog. **Email**—For email delivery, you must enter the voter's email address in the **E-Mail** field on the voter's Vote-By-Mail tab. **Fax**—For fax delivery, you must enter the voter's fax number on the Vote-By-Mail Addresses dialog. Selecting **Email** or **Fax** automatically sets an overseas condition for the voter for this election.
Ballot Return Blocked	Indicates that the voter's mail ballot has been blocked from being return processed.
Block/Unblock Return	Click **Block Return** to prevent return processing of a voter's mail ballot because they voted at the polls, even though they have mailed the ballot back to the elections office. See Block the Return of a Voter's Mail Ballot for more information. Click **Unblock Return** to reverse the block.
Comments	Use this field to indicate why the change was made, such as why a second ballot was issued or why a voter's return was blocked.
O'seas	This field appears only if the ballot has been returned and the voter is an overseas voter. The possible values are M—Mail, E—Email, and F—Fax. This information is collected for reporting to the U. S. Election Assistance Commission (EAC).
Change Mil/Civ	Toggles the Military/Civilian setting assigned to this request.
Cancel Request	Cancels the Vote-By-Mail Request. The **Request Status** on the **Vote-By-Mail** tab displays *Request Canceled*. Any ballots already issued to the voter remain assigned to this Vote-By-Mail Request. **Note:** If a mail ballot is returned by the postal service as undeliverable to the voter, do not cancel the request. See How to Process an Undeliverable Mail Ballot for instructions.
Audit Report	View the Absentee Audit Report for this Vote-By-Mail Request. Information in the Absentee Audit Report cannot be changed or deleted.
Release Ballot 2nd/3rd Ballot	Records the issuance of a second or third replacement ballot. This button displays the Release Ballot dialog where you record issuance of the ballot.

Reverse Ballot Delivery	Reverses the issuance of a ballot to the voter. You should perform a reverse ballot delivery operation only when a ballot has not yet been mailed or otherwise delivered to the voter. If your county uses ballot numbers, you are asked if you want to delete the ballot number. Click **Yes** if you want to delete the ballot number from the database so it can be reused for another voter; this removes the ballot number from the list of used numbers. Clicking **No** cancels the reverse ballot delivery operation. **Note**: You must be granted the *MailBallotReversal* permission to use this option.
Reverse Return of Ballot	The ballot is no longer marked as voted. **Note**: You must be granted the *MailBallotReversal* permission to use this option.
Reverse Early/In-office Vote	The vote cast during early voting or in-office absentee voting is reversed. **Note**: You must be granted the *MailBallotReversal* permission to use this option.
Reverse Request for 2nd/3rd Ballot	The request for a replacement ballot that has not yet been delivered to the voter is reversed in the Voter Focus system. **Note**: You must be granted the *MailBallotReversal* permission to use this option.
Previous Request	Displays the previous election for which this voter has a Vote-By-Mail Request.
Next Request	Displays the next election for which this voter has a Vote-By-Mail Request.
Close	Closes the dialog and returns you to the **Vote-By-Mail** tab in the voter's record. All changes made on the Mail Ballot dialog are saved to the database.
Maintain Requester Information	Opens the Maintain Requester Information dialog. Use this if a third party requested or picked up a ballot for the voter.
Canvassing Board Reinstatement	Reinstates a mail ballot previously referred by the elections office but reinstated by the Canvassing Board. Reinstated ballots are counted as valid mail ballot returns. Any notices (such as an Absentee Referral Letter or a Signature Affidavit Notice) that were scheduled when the ballot was referred are unscheduled automatically by a reinstatement. See Reinstate a Mail Ballot for more information.

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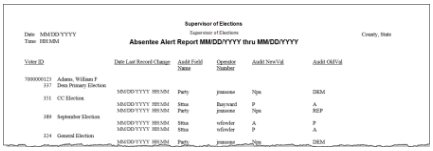
EXHIBIT M:

VR Systems Report: “Absentee Alert Report”

Absentee Alert Report

To run: **REPORTING > Reports > Vote-By-Mail Reports > Vote-By-Mail Voter Lists > Absentee Alert Report**

This report provides voter audit information for any voters who have outstanding Vote-By-Mail requests. It lists changes to voter records, such as a change of residence, mailing, default ballot address, or ballot address for this election, during the time period you specify. This report should be examined to see if any corrective action is required by the Vote-By-Mail coordinator.



Supervisor of Elections

Supervisor of Elections

Date MM/DD/YYYY
Time HH:MM

County, State

Absentee Alert Report MM/DD/YYYY thru MM/DD/YYYY

Voter ID		Date Last Record Change	Audit Field Name	Operator Number	Audit NewVal	Audit OldVal
7000000123	Adams, William F					
107	Dem Primary Election					
		MM/DD/YYYY HH:MM	Party	jonsone	Npa	DEM
101	CC Election					
		MM/DD/YYYY HH:MM	Situs	Barnyard	P	A
		MM/DD/YYYY HH:MM	Party	jonsone	Npa	REP
100	September Election					
		MM/DD/YYYY HH:MM	Situs	wfowler	A	P
		MM/DD/YYYY HH:MM	Situs	wfowler	P	A
124	General Election					
		MM/DD/YYYY HH:MM	Party	jonsone	Npa	DEM

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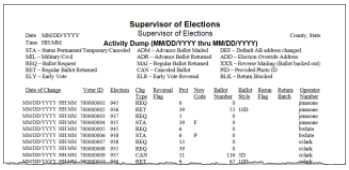
EXHIBIT N:

VR Systems Report: "Absentee Activity Dump"

Absentee Activity Dump

To run: **REPORTING > Reports > Vote-By-Mail Reports > Vote-By-Mail Audit Reports > Absentee Activity Dump**

This report lists the Vote-By-Mail transactions by user with a date. Use this report to track a user's data entry operations. The report contains a shorthand of mail ballot requests entered, delivered, and returned. You have the option of limiting the data to a specified date range.



Supervisor of Elections
Supervisor of Elections
Activity Dump (MM/DD/YYYY thru MM/DD/YYYY)

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EXHIBIT O:

PRINELLAS PROTECED VOTER WEBSITE BLOCK

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Google Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Select Language

Powered by Google Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Last Name:

Siamas

Date of Birth:

[redacted]

House Number of Voter's Residence Address:

[redacted]

Last Four Digits of SSN:

[redacted]

OR

Driver's License (or State ID) Number:

[redacted]

Search

Back

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email:** Election@VotePinellas.gov (mailto:election@votepinellas.gov) | Public Records Request Form (/General-Information/Contact-Us/Public-Record-Request)

P:(727) 464-VOTE (8683) ● F:(727) 464-6239

Election Service Center
13001 Starkey Rd.
Largo, FL 33773
(Starkey Lakes Corporate Center)

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

County Building
501 First Avenue North
St. Petersburg, FL 33701
(Fifth Street North Entrance)

F.S. 668.6076 Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. To submit a public records request, use this form. (/General-Information/Contact-Us/Public-Record-Request)

Absentee Status for All Absentee Voters

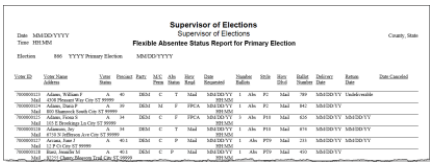
To run a report having the same information as the old Absentee Status for All Absentee Voters report:

1. Go to **REPORTING > Reports > Vote-By-Mail Reports > Vote-By-Mail Voter Lists > Vote-By-Mail Flexible Report**.
2. On the **Vote-By-Mail Flexible Report** dialog, make the following selections:
   - **Output Format** = Status Report
   - **Absentee Status** = All
   - **Location** = All

   To limit the report to a single district within a district type (for example, CC district 1), select from the **District Selection** drop-down list. To run the report for all districts, leave the **District Selection** field blank.
3. Click **OK** to run the report.

The title of the report is now the Flexible Absentee Status Report for *<election name>*.

When run with the above parameters, this report provides a complete list of all Vote-By-Mail requests for the selected election with the dates the request was made, the ballot was delivered/mailed, and the ballot was returned. It includes the ballot style and number of each ballot that the voter has received. The report also includes email addresses for the purposes of sending overseas voters candidate information via email.



Supervisor of Elections
Supervisor of Elections
Flexible Absentee Status Report for Primary Election

This is a long report consuming at least two lines for each voter. An underline separates each voter entry, which on some printers can take a long time to print. If you are interested in a single voter's information, we recommend you instead retrieve the voter's record, go to their Vote-By-Mail Request Status dialog, and click **Audit Report** to create their Absentee Audit Report.

To view a list of other ways to run this flexible report, see Vote-By-Mail Flexible Report.

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EXHIBIT O:

Summary of Affected Judicial Officers and Staff

Exhibit O – Summary of Affected Judicial Officers and Staff

This exhibit lists judges and judicial assistants within the Florida Second District Court of Appeal and the Sixth Judicial Circuit whose vote-by-mail ballots were flagged for unverified submission or were submitted through restricted channels, consistent with the fraud patterns outlined in the accompanying affidavit.

Name	Position	Court	PRI-Ballot Req Date	GEN-Ballot Req Date	Verified ID Status	Protected	Judge Chambers Implicated
Nelly N. Khouzam	Judge/Close Relation	2nd DCA	6/23/2024	9/9/2024	NO/NO	YES	Nelly Khouzam/Morris Silberman
Morris Silberman	Judge/Close Relation	2nd DCA	6/23/2023	9/9/2024	NO/NO	YES	Morris Silberman
Craig C Villanti	Judge	2nd DCA	6/23/2023	9/9/2024	NO/NO	YES	Craig C. Villanti
Gabriella C. Silberman	Close Relation	2nd DCA	6/23/2023	9/9/2024	NO/NO	YES	Morris Silberman/Nelly N. Khouzam
Patricia Muscarella	Circuit Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Patricia Muscarella
Thomas Ramsberger	Judge/Close Relation	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Peter Ramsberger/Thomas Ramsberger
Louise Smith	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Shawn Crane -Chief Judge 6th Circuit
Kim Campbell	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Kim Campbell
Pamela A.M. Campbell	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Pamela A.M. Campbell
Sherwood Coleman	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Sherwood Coleman
Jennifer Dubbeld	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Jennifer Dubbeld
Philip J Federico	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Philip J Federico
Evan Frayman	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Evan Frayman
Brian Gnage	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Brian Gnage
Mary M. Handsel	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Mary M. Handsel
Elizabeth Jack	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Elizabeth Jack
George Jirotka	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	George Jirotka
Doneene Loar	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Doneene Loar
Philippe Matthey	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Philippe Matthey
Patrice Moore	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Patrice Moore
Cynthia J. Newton	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Cynthia J. Newton
Nichole Pearlman	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Nichole Pearlman
Joshua Riba	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Joshua Riba
Pat Siracusa	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Pat Siracusa
James R. Stearns	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	James R. Stearns

See Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009); Williams v. Pennsylvania, 136 S. Ct. 1899 (2016); Fla. R. Gen. Prac. & Jud. Admin. 2.330(d)(1); Canon 3E(1)(a), Fla. Code Jud. Conduct.

Name	Position	Court	PRI-Ballot Req Date	GEN-Ballot Req Date	Verified ID Status	Protected	Judge Chambers Implicated
Susan St. John	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Susan St. John
Kimberly Todd	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Kimberly Todd
Amy M. Williams	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Amy M. Williams
John Carassas	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	John Carassas
Diane Croff	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Diane Croff
Robert Dittmer	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Robert Dittmer
Holly Grissinger	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Holly Grissinger
Edwin Jagger	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Edwin Jagger
James Pierce	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	James Pierce
Lauralee G. Westine	Judge	6th Circuit	6/23/2024	9/9/2024	NO/NO	YES	Lauralee G. Westine
Debi McCarty	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	Daniel D. Diskey
Stacy Wisman	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	David Ellis
Jill Psenisky	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	Philip J Federico
Bonnie Whitehall	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	George Jirotka
Valerie McGivern	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	Thomas Ramsberger
Melinda Vincent	Judicial Assistant	6th Circuit	6/23/2024	9/9/2024	NO/NO	NO	Steve Berlin
Annie Nguyen	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Joseph A.Bulone
Jess Rayburn	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Julie L. Sercus
Amber Demiduk	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	John Carassas
Veronica Jupiter	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Diane Croff
Lisa Schultz	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Frank Grey
Tracy Curley	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Kathleen T. Hessinger
Michelle Hall	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Edwin Jagger
JoAn Caffentzis	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Lorraine Kelly
Vicki Masterson	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Theodora C Komninos
Cheryl Nierengarten	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Cathy McKyton
Darleta Burris	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	James Pierce
Pamela Gariepy	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Joseph Poblick
Kim Haumann	Judicial Assistant	6th Circuit	6/23/2023	9/9/2024	NO/NO	NO	Brett Szematowicz
John D Couriel	Judge	Supreme			NO/NO	YES	John D Couriel

See Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009); Williams v. Pennsylvania, 136 S. Ct. 1899 (2016); Fla. R. Gen. Prac. & Jud. Admin. 2.330(d)(1); Canon 3E(1)(a), Fla. Code Jud. Conduct.

Each entry is based on data sourced directly from the Florida Department of State's *Vote By Mail Early Voting Reports* and the Florida Voter Registration System (FVRS), as cited in Exhibit B and corroborated in Exhibits H and N.

Judicial assistants are confidential agents of the judge and have access to chambers communications, calendar settings, and sensitive court operations. If a judicial assistant is the victim of targeted vote-by-mail fraud related to an ongoing appeal, the judge is likely to be a material witness or possess personal knowledge of disputed facts. As such, disqualification of the judge is mandatory under Rule 2.330(d)(1) and Canon 3E(1)(a), even if the judge's own voter record is not directly implicated. Failure to grant disqualification under these circumstances not only violates ethical and procedural mandates, but also exacerbates the structural error inherent in this case, undermining the constitutional integrity of the tribunal.

EXHIBIT P:

PRINELLAS PROTECED VOTER WEBSITE BLOCK

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Google Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Select Language

Powered by Google Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Last Name:

Siamas

Date of Birth:

[redacted]

House Number of Voter's Residence Address:

[redacted]

Last Four Digits of SSN:

[redacted]

OR

Driver's License (or State ID) Number:

[redacted]

Search

Back

Julie Marcus • Pinellas County Supervisor of Elections

Hours: Monday - Friday, 8 a.m. - 5 p.m. | **Email:** Election@VotePinellas.gov (mailto:election@votepinellas.gov) | Public Records Request Form (/General-Information/Contact-Us/Public-Record-Request)

P:(727) 464-VOTE (8683) ● F:(727) 464-6239

Election Service Center
13001 Starkey Rd.
Largo, FL 33773
(Starkey Lakes Corporate Center)

Pinellas County Courthouse
315 Court Street, Room 117
Clearwater, FL 33756

County Building
501 First Avenue North
St. Petersburg, FL 33701
(Fifth Street North Entrance)

F.S. 668.6076 Under Florida law, email addresses are public records. If you do not want your email address released in response to a public records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. To submit a public records request, use this form. (/General-Information/Contact-Us/Public-Record-Request)

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Robin Devine, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

12760 Indian Rocks Rd Unit 571 Largo FL 33774

2. On approx 8/10/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 14, ____, 2024.

Robin L Devine
Signature

Robin L. Devine
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 14th
day of August, 2024, by Robin L. DeVine.

Christine Peters
(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned
Name of Notary Public)

Personally Known ☐OR
Produced Identification ☐

[redacted]
Type of Identification Produced

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I, [Your Full Name] Robert A. Ferri, being duly sworn, depose and say:

1. Personal Information:

- I am a resident of Pinellas County, Florida.
- My current address is [Your Full Address] 7602 Ridge Rd. Seminole FL 33772.
- My date of birth is [Your Date of Birth] 08/12/1956.

2. Statement of Facts:

- On [Date You Received the Ballot] 06/23/24, I received a vote-by-mail ballot at my residence.
- I did not request a vote-by-mail ballot for the 2024 Primary Election on 06/23/2024.
- I have not authorized anyone to request a vote-by-mail ballot on my behalf on 06/23/2024.
- I have confirmed with that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.
- I did not sign a DS-DE 160 Form requesting a Vote-By-Mail Ballot a copy of attached.

3. Conclusion:

- To the best of my knowledge, this vote-by-mail ballot was sent to me without my request or authorization.
- I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on [Date] 8/14/24 at Clearwater, FL. [City, State].

[Your Full Name] Robert A. Ferri

[Your Signature] Robert A Ferri

NOTARY ACKNOWLEDGMENT

STATE OF FLORIDA

COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me by means of ✓ physical presence or ___ online notarization, this 14th day of August, 2024, by [Your Full Name].

Christine Peters

(Signature of Notary Public)

Christine Peters

(Name of Notary, typed, printed, or stamped)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ___ OR Produced Identification ✓

Type of Identification Produced: DL [redacted]

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____ / ____ / ____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☒ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** ____ / ____ / ____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** ____ / ____ / ____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, CATHI CHAMBERLAIN, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

10520 SAN FERNANDO BLVD NE; ST. PETERSBURG, FL 33702

2. On 7-18-2024, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on AUGUST, 17, 2024.

Signature

CATHI CHAMBERLAIN

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 17th
day of August, 2024, by Cathi Chamberlain.

Christine Peters

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Christine Peters

(Print, Type, or Stamp Commissioned
Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

AFFIDAVIT

(Amendment to AFFIDAVIT Signed Aug. 17, 2024)

STATE OF FLORIDA

COUNTY OF PINELLAS

I, Cathi Chamberlain, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is: 10520 San Fernando Boulevard, NE; St. Petersburg, FL 33702.
2. I am adding documents related to my Affidavit signed on August 17, 2024 (ATTACHMENT A)
3. "5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election." (ATTACHMENT B and C)
4. "6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot." (ATTACHMENTS B and D)
5. The Pinellas Supervisor of Elections (SOE) and I both agree I did not request a Vote by Mail Ballot on June 23, 2024, yet when I researched my name on the SOE Website, a side portal seemingly shows that I did. (ATTACHMENTS B and E).
6. I am concerned about the integrity of my voter registration information even more at this point than I was when I submitted my previous affidavit signed on August 17th, 2024 (Attachment A) and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on 27th of August, 2024.

Cathi Chamberlain

Signature

Cathi Chamberlain

Full Name

STATE OF FLORIDA
COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me by means of ✓ physical presence or ___ online notarization, this 27th day of August, 2024, by Cathi Chamberlain. Type of Identification Produced: personally known

Christine Peters

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 486653
Expires February 25, 2028

Commissioned Name of Notary Public

ATTACHMENT A

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, [redacted] am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

[redacted]

2. On 7-15-24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024 which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6 I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 17, 2024.

Signature

Cathi Chamberlain

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 17th day of August, 2024, by Cathi Chamberlain.

CHRISTINE PETERS
Commission # HH 456853
Expires February 28, 2028

(Signature of Notary Public Florida)

Christine Peters

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

ATTACHMENT B

FW: public records request

Chase, Dustin <dchase@votepinellas.gov>

Thu 8/15/2024 11:59 AM

To:Rules for Deplorables <cathi@rulesfordeplorablesbook.com>
Cc:Chase, Dustin <dchase@votepinellas.gov>;Smith, Matt <masmith@votepinellas.gov>;McKnight-Taylor, Ashley <ataylor@votepinellas.gov>

Dear Cathi,

It was nice to talk to you today.

The information you've requested is confidential and exempt from disclosure under Florida law (see Section 101.62(2), Florida Statutes). Granted, there is an exception for the voter themselves. Typically, we require the voter to visit our office and present identification to obtain this information. In your case, we are making an exception because we know you, you confirmed with us you sent the email and you verified the last four of your social security number with me.

You mentioned you believe you requested your mail ballot on June 23, 2024. Our records indicate you actually requested it last year on May 19, 2023, at 4:41 p.m. This aligns with the fact that we sent you a mail ballot for the Presidential Preference Primary, which was not returned as undeliverable or voted. Our records also show you voted in person at your polling place on March 19.

Regarding the DS-DE 160 form, The Florida Division of Elections did not finalize the form until nearly a year after you submitted your request. The law does not require all voters requesting mail ballots to file a DS-DE 160: only voters requesting a mail ballot in writing. Since you requested your mail ballot online using your driver license number, there is no DS-DE 160 on file for you. Thereby, we have no records responsive to your request.

We hope that you will help to clarify this process and dispel any misinformation.

Sincerely,

Dustin Chase, Deputy Supervisor of Elections
Representing Julie Marcus, Pinellas County Supervisor of Elections
13001 Starkey Rd., Largo, FL 33773
Phone: (727) 464-4988
Fax: (727) 464-6239
dchase@votepinellas.gov
Follow us @VotePinellas
Like us on Facebook

Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. -- F.S. 668.6076

Conforme a la legislación de Florida, las direcciones de correo electrónico son registros públicos. Si no desea que su correo electrónico se divulgue como respuesta a una solicitud de registros públicos, no envíe un correo electrónico a esta entidad. En su lugar, póngase en contacto con esta oficina por teléfono o por escrito. -- F.S. 668.6076

From: Rules for Deplorables <cathi@rulesfordeplorablesbook.com>
Sent: Tuesday, August 13, 2024 7:34 PM
To: Mail, Election <election@votepinellas.gov>; Chase, Dustin <dchase@votepinellas.gov>; Marcus, Julie <jmarcus@votepinellas.gov>
Subject: public records request

AMENDMENT C

Form Name: View Web Absentee Request
Captured: 8/26/2024 8:48:51

View Web Absentee Request

Print Console Voters Help Exit

Print 107052957 CATHI CHAMBERLAIN 10525 SAN FERNANDO BLVD NE
Mailing Address 1 Mailing Address 2 City State Zip Country

Voter Classification Civilian, Domestic
Email Address cathichamberlain2022@gmail.com
Phone Number 7273207716 Submitted Date: May/15/2023 DLN# [redacted] Last4SSN# [redacted]

Absentee Ballot Address
Line 1
Line 2
Line 3
City
State Zip
Country
Fax

Requester Information
First Name
Last Name
Address
Relationship
DLN#
Last4SSN# [redacted]

Voter provided UOCAVA Address
Remarks

Requested Delivery Mail

VR Systems Voter Focus

AMENDMENT D

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____ / ____ / _____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____ / _____ / _____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____ / _____ / _____
The voter directly instructed me to make this request for them.

AMENDMENT E

Complete the form to:

- Check the status of your mail ballot
- View where to vote on Election Day
- View sample ballots
- See upcoming elections
- Review update your voter registration information
- Review your voting activity for the past 12 months

2024 Primary Election

Voter Status: You are scheduled to receive a mail ballot for this election.

View Sample Ballot

Your Mail Ballot Information

Ballot 1 Status

1 REQUESTED > 2 SENT > 3 RECEIVED > 4 COUNTED

Ballot 1 Requested by Voter

Date Requested: Sunday, June 23, 2024

Ballot Destination:

10530 SAN FERNANDO BLVD NE
ST PETERSBURG, FL 33702

Election Day Polling Location:

Epiphany Ukrainian Catholic Church
4331 9th Ave N
St Petersburg, FL 33703

View Early Voting Locations

Important Dates

Election Day: Tuesday, August 20, 2024
Registration Closes: Monday, July 22, 2024
Early Voting Begins: Saturday, August 10, 2024
Early Voting Ends: Sunday, August 18, 2024

AFFIDAVIT

STATE OF FLORIDA

COUNTY OF PINELLAS

I, [Your Full Name] Robert A. Ferri, being duly sworn, depose and say:

1. Personal Information:

- I am a resident of Pinellas County, Florida.
- My current address is [Your Full Address] 7602 Ridge Rd. Seminole FL 33772.
- My date of birth is [Your Date of Birth] 08/12/1956.

2. Statement of Facts:

- On [Date You Received the Ballot] 06/23/24, I received a vote-by-mail ballot at my residence.

- I did not request a vote-by-mail ballot for the 2024 Primary Election on 06/23/2024.

- I have not authorized anyone to request a vote-by-mail ballot on my behalf on 06/23/2024.

- I have confirmed with that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

- I did not sign a DS-DE 160 Form requesting a Vote-By-Mail Ballot a copy of attached.

3. Conclusion:

- To the best of my knowledge, this vote-by-mail ballot was sent to me without my request or authorization.

- I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on [Date] 8/14/24 at Clearwater, FL. [City, State].

[Your Full Name] Robert A. Ferri

[Your Signature] Robert A Ferri

NOTARY ACKNOWLEDGMENT

STATE OF FLORIDA

COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me by means of ✓ physical presence or ___ online notarization, this 14th day of August, 2024, by [Your Full Name].

Christine Peters

(Signature of Notary Public)

Christine Peters

(Name of Notary, typed, printed, or stamped)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ___ OR Produced Identification ✓

Type of Identification Produced: DL [redacted]

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____ / ____ / ____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☒ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____ / _____ / _____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____ / _____ / _____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Robin Devine, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

12760 Indian Rocks Rd Unit 571 Largo FL 33774

2. On approx 8/10/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 14, ____, 2024.

Robin L Devine
Signature

Robin L. Devine
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 14th day of August, 2024, by Robin L. DeVine.

Christine Peters
(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☐OR
Produced Identification ☐

D [redacted]
Type of Identification Produced

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Valerie Schoeman, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is: 2533 Skipper Trl, Clearwater, FL 33761.

2. On or about July 16th, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 26th, 2024.

Signature

Valerie Ann Schoeman

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 26th
day of August, 2024, by Valerie Ann Schoeman.

(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2026

Personally Known ☐OR
Produced Identification ☑

FL-DL [redacted]

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot:
(only if different than home address)

_____ **City:** _____

State: _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** ____/____/____
The voter directly instructed me to make this request for them.

DS-DE 160 (eff. 04/17/2024

Rule 1S-2.055, F.A.C.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Nikki Schoeman, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

2533 Skipper Trl, Clearwater, FL 33761.

2. On or about July 16th, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 26th, 2024.

Nikki Schoeman
Signature

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 26th
day of August, 2024, by Nikki Schoeman.

Christine Peters
(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☐ OR
Produced Identification ☑

FL DL [redacted]
Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____ / ____ / ____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot:

(only if different than home address)

_____ **City:** _____

State: _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____ / _____ / _____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____ / _____ / _____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Vernon C. Verigan, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

10630 - 95 ST. N, SEMINOLE, FL 33777.

2. On OR ABOUT 7-16-24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on AUGUST, 26, 2024.

Signature

VERNON CLARE VERIGAN

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 26th day of August, 2024, by Vernon Verigan.

(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☐OR
Produced Identification ☑

FL-DL [redacted]

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62 F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

DS-DE 160 (eff. 04/17/2024

Rule 1S-2.055, F.A.C.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Nancy Verigan, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

10630-95th St. N. Seminole, FL 33777.

2. On or about July 16th, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on July, 26, 2024.

Nancy Ann Verigan
Signature

Nancy Ann Verigan
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 26th
day of August, 2024, by Nancy Ann Verigan.

Christine Peters
(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

NOTARY PUBLIC STATE OF FLORIDA
CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☐ OR
Produced Identification ☑

FL-DL [redacted]
Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62 F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot:
(only if different than home address)

_____ **City:** _____

State: _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

DS-DE 160 (eff. 04/17/2024

Rule 1S-2.055, F.A.C.

Gmail

Christopher Gleason <gleasonforpinellas@gmail.com

24-3717CI

UBLIC RECORDS REQUEST- VOTE BY MAIL BALLOT REQUESTS

hristopher Gleason <gleasonforpinellas@gmail.com> Wed, Jul 17, 2024 at 12:05 F
: Matt <masmith@votepinellas.gov>, Dustin Chase <dchase@votepinellas.gov>, OECS@dos.myflorida.com, publicrecordsrequest ublicrecordsrequest@votepinellas.gov>, Maria.Matthews@dos.myflorida.com, "Byrd, Cord" <cord.byrd@dos.myflorida.com>
[redacted]

FILED
ST. PETERSBURG BRANCH
CLERK OF CIRCUIT COURT
2024 AUG 20 PM 2:34

Dear Custodian of Records,

I am writing to submit an open records request under the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes seeking access to public records, Florida State Election Records, and Federal Election Records related to the following:

- Copies of any and all Logs, List(s) and/or documents of the Pinellas County Voters who have requested a Vote by Mail Ballot be mailed to them for the August 20th Primary Election

I am requesting these public records in the electronic file format .PDF.

I understand that some of this information may already be publicly available, but I are seeking the official and comprehensive records directly from the county's election authorities to ensure accuracy and completeness.

Please consider this letter as a formal request for disclosure under the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes.

Please provide these records in a format that is consistent with the requirements of the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes If possible, We request that the records be provided electronically, via email or a secure file-sharing platform.

If portions of the requested records are exempt from disclosure under the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes, please provide us with a written explanation of the specific legal basis for any redactions or withholdings.

We request that this public records request be processed promptly and in accordance with the statutory timelines for response and production of records under the Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes.

I hereby certify that I will not:

(A) Use any list of name(s) or addresses contained in or derived from the records or information for the purpose of selling or offering for sale any property or service to any person listed or to any person who resides at any address listed

(B) Sell, give, or otherwise make available to any person any list of name(s) or addresses contained in or derived from the records or information for the purpose of allowing that person to sell or offer for sale any property or service to any person listed or to any person who resides at any address listed.

As per Article I, section 24 of the Florida Constitution, and Chapter 119, Florida Statutes, we expect a prompt response to this request. If, for any reason, you cannot comply with this request within the specified timeframe, please provide a written explanation for the delay and indicate when we can expect the records to be made available.

Please take appropriate steps to ensure that records responsive to this request are not deleted by your office before the completion of processing for this request. If records potentially responsive to this request are likely to be located on systems where they are subject to potential deletion, including on a scheduled basis, please take steps to prevent that deletion, including, as appropriate, by instituting a litigation hold on those records. To ensure that this request is properly construed, that searches are conducted in an adequate but efficient manner and that extraneous costs are not incurred.

By working together at the outset, The Justice Society and your agency can decrease the likelihood of costly and time-consuming litigation in the future.

Where possible, please provide responsive material in electronic format by email or via a shared online drive.

Warmest Regards,

Christopher Gleason

Candidate for Supervisor of Elections Pinellas County, Florida

Gmail

Christopher Gleason <gleasonforpinellas@gmail.com

UBLIC RECORDS REQUEST- VOTE BY MAIL BALLOT REQUESTS

hase, Dustin <dchase@votepinellas.gov> Thu, Jul 25, 2024 at 4:01 P
: "GleasonforPinellas@gmail.com" <gleasonforpinellas@gmail.com>, [redacted]
: publicrecordsrequest <publicrecordsrequest@votepinellas.gov>

Dear Mr. Gleason,

As a candidate with opposition, you are entitled to the list of mail ballot requests after filing your oath of acquisition.

Additionally, please be advised that fulfilling your request as stated would require an estimated 18,000 hours to compile the logs and documents for each voter who requested a mail ballot. Given this substantial time requirement, there will be significant costs associated with the retrieval, review, and redaction of these records.

Under Florida law, we are permitted to charge a special service fee for the extensive use of information technology resources and/or clerical or supervisory assistance required to process your request. The estimated cost for fulfilling your request will be provided upon determining the exact scope and volume of records responsive to your request. Please note that these costs are based on actual labor and resources incurred by the Supervisor of Elections Office.

We are prepared to work with you to narrow the scope of your request to make it more manageable and cost-effective. For instance, if there are specific types of logs or subsets of information you are most interested in, please let us know so we can focus our efforts accordingly.

Furthermore, please be informed that any exempt or confidential information will be redacted in accordance with the applicable Florida Statutes.

To proceed, we invite you to either narrow the scope of your request to reduce the estimated time and resources required, or we can provide a full cost estimate for processing the entire request as currently stated. Please let us know your preference and any specific subsets of the requested information you are requesting. If a response is not received within 30 days of this correspondence, we will consider the request closed.

Sincerely,

Dustin Chase, Deputy Supervisor of Elections

Representing Julie Marcus, Pinellas County Supervisor of Elections

13001 Starkey Rd., Largo, FL 33773

Phone: (727) 464-4988

Fax: (727) 464-6239

dchase@votepinellas.gov

Follow us @VotePinellas

Like us on Facebook

Under Florida law, e-mail addresses are public records. If you do not want your e-mail address released in response to a public-records request, do not send electronic mail to this entity. Instead, contact this office by phone or in writing. – F.S. 668.6076

24-3717C I

FILED
ST. PETERSBURG BRANCH
2024 AUG 20 PM 2:34
KEN BURKE
CLERK OF CIRCUIT COURT

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, JAMES M. BROWN JR, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

100 BLUFF VIEW DR. APT 211A BELLEAIR BLUFFS FL 33770

2. On OR ABOUT JULY 16, 2024, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 19, 2024.

James M. Brown JR
Signature

JAMES M. BROWN JR
Full Name

STATE OF FLORIDA
COUNTY OF PINELLAS

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 19th day of August, 2024, by James M. Brown Jr.

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Christine Peters
(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Ann Whisler, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:
99 Dolphin DR N. Oldsmar, FL 34677.

2. On or about 7/6/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 16, ____, 2024.

Ann Whisher
Signature

Ann Whisher
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 16 day of August, 2024, by Ann Whisher.

Christine Peters
(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496853
Expires February 26, 2028

Christine Peters
(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Kathleen A. Shanks, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

2755 Curlew Rd Lot 76 Palm Harbor, FL 34684.

2. On or about July 16, 24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on 08-27, ____, 2024.

Kathleen A Shanks
Signature

Kathleen A. Shanks
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 27th
day of August, 2024, by Kathleen A. Shanks.

Christine Peters
(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Print, Type, or Stamp Commissioned
Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ Date: ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

☐ Spouse
☐ Parent
☐ Child
☐ Grandparent
☐ Grandchild
☐ Sibling
☐ Parent of voter's spouse
☐ Child of voter's spouse
☐ Grandparent of voter's spouse
☐ Grandchild of voter's spouse
☐ Sibling of voter's spouse
☐ Voter's legal guardian
☐ Designee for a voter with a disability

Designee's Signature: _____ Date: ____/____/____
The voter directly instructed me to make this request for them.

DS-DE 160 (eff. 04/17/2024

Rule 1S-2.055, F.A.C.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Karol Kay Pravda, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is: 1500 Edna Ave. NW, Largo, FL. 33770.

2. On about July 16, 2024 I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 27, 2024.

Karol Kay Pravda
Signature

Karol Kay Pravda
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 27th
day of August, 2024, by Karol Kay Pravda.

Christine Peters
(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ mailing address in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** ____/____/____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, THOMAS ROMANO, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

5313 18th ST. NE. ST. PTE FL 33703.

2. On OR ABOUT July 16th, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August 27, 2024.

Signature

THOMAS G. ROMANO
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 27th day of August, 2024, by Thomas Romano.

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☒ AP

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ Date: ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ Date: ____/____/____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Rhonda Romano, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

5313 18th St. NE.

2. On or about July 6, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 27, 2024.

Rhonda Romano
Signature

Rhonda Romano
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 27th
day of August, 2024, by Rhonda Romano.

Christine Peters
(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned
Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ Date: ____/____/____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ Date: ____/____/____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, MAUREEN ZILLES, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

8392 Meadowbrook Dr East, Largo, FL 33777.

2. On or about 7/25/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 28, 2024.

Signature

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 28th day of August, 2024, by Maureen Zilles.

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, LouAnn M. Rice on Behalf of Simone M Rice (mother) Now Deceased, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

1209 E. Boyer St., Tarpon Springs, FL 34689.

2. On or about 7/16/24, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot. → on behalf of my mother

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on Aug 29th, ____, 2024.

Signature on behalf of Simone M. Rice

LouAnn M. Rice
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 29th day of August, 2024, by LouAnn Marie Rice.

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Signature of Notary Public Florida)

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62 F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot: _____ **City:** _____

(only if different than home address) **State:** _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

LouAnn Rice

1209 E Boyer St.

Tarpon Springs, FL 34689

(also Simone Rice's address)

8/27/2024

Reference:

Simone Marie Rice's Request for a mail in ballot 6/23/2024, as seen on Pinellas County web site.

At age 90 and a few years previous, I helped my mother obtain her mail in vote when she was not capable.

I also drove my mother to the polls to turn in her mail in ballot and vote later when she was capable.

This week I looked back I looked back at files I had because I could not remember re-requesting a mail in ballot this spring as I understand was required if mom wanted to continue to vote by mail.

Initially I mistakenly saw in my files the Vote by mail ballot envelope I copied 2/22/2024 and thought that was it but it was actually her return envelope for the 2024 Presidential Primary.

I am sure I would have saved a copy of the website page confirming if I had RE-requested to continue her voting by mail but I have none and know I put it off because I was unsure about my mother's multiple health issues at that point, June 2024.

By June 23rd 2024, the supposed date my mother requested to continue with Mail-In Voting, my mother was on a fast decline.

Simone had been on pain killers and recently anti-depressants both making wading through political conversation impossible and un-important.

My mother was bed ridden since her last operation, had no computer and was incapable of using her smart phone to navigate to any website.

I swear, because of her state of health, there is **No Way** I requested a Mail in ballot for my mother on June 23rd , 2024.

I knew she would not last much longer and unfortunately was proven to be correct as she passed away 16 days later.

I still have the unopened mailed ballot received shortly before she passed.

I do not see any Postal Stamped Date indicating when it was mailed.

LouAnn M Rice

JULIE MARCUS
SUPERVISOR OF ELECTIONS
PINELLAS COUNTY
13001 Starkey Rd., Largo FL 33773-1416

OFFICIAL ELECTION MAIL
Authorized by the U.S. Postal Service

NON PROFIT ORG
US POSTAGE
PAID
ST. PETERSBURG, FL
PERMIT #4020

OFFICIAL BALLOTING MATERIAL
FIRST-CLASS MAIL

DO NOT FORWARD

SIMONE M RICE

1209 E BOYER ST TARPON SPRINGS FL 34689

84270000150

9114 5112 5703 1408 1427 2547

G113

SIMONE M RICE
1209 E BOYER ST
TARPON SPRINGS FL 34689

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Nancy Skinner-Eriksson, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

1449 Ridge Shore Dr Tarpon Spngs Fl 34689

2. On or about 7-16-24 I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on August, 29, 2024.

Nancy Skinner-Ericsson
Signature

Nancy Skinner-Ericsson
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of
☑ physical presence or ☐ online notarization, this 29th
day of August, 2024, by Nancy Skinner-Ericsson

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Christine Peters
(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned
Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Christina M. Ott, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

3300 Fox Chase Cir #216 Palm Harbor FL 34683

2. On July 16 2024, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on Aug 27, 27, 2024.

Signature

Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 27th day of August, 2024, by Christina Ott.

(Signature of Notary Public Florida)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

(Print, Type, or Stamp Commissioned Name of Notary Public)

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

EXHIBIT 1

DS-DE 160 (eff. 04/17/2024)

Statewide Vote-By-Mail Ballot Request Form

(s. 101.62, F.S.)

To request a vote-by-mail ballot for yourself, complete only the top section.
To request a vote-by-mail ballot for someone who directly instructed you to do so, complete both sections.

Voter's Name: _____ **Voter's Date of Birth:** ____/____/____

Voter's Florida driver license (FL DL) or Florida identification (FL ID) card number:

If no FL DL or FL ID, then provide last 4 digits of Social Security Number:

Voter's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Voter's mailing address for ballot:
(only if different than home address)

_____ **City:** _____

State: _____ **Zip code:** _____ **Country, if outside US:** _____

Please update my ☐ **residential address** and/or my ☐ **mailing address** in my voter record with the information listed above.

Phone number (optional): _____ Email address (optional): _____

This request is good for all elections through the end of the calendar year of the next general election. If you only want a ballot for specific elections, list them here: _____

Voter's Signature: _____ **Date:** _____/_____/_____
(not required if voter is an absent uniformed services voter or overseas voter, or if request is made by a designee)

You must also complete the section below if you are requesting a Vote-by-Mail Ballot for someone else.

Designee's Name: _____

Designee's Home Address: _____

City: _____ **State:** _____ **Zip code:** _____

Designee's driver license or identification card number:

If no DL or ID, then provide last 4 digits of Social Security Number:

Phone number (optional): _____ Email address (optional): _____

Designee's relationship to the voter:

- ☐ Spouse
- ☐ Parent
- ☐ Child
- ☐ Grandparent
- ☐ Grandchild
- ☐ Sibling
- ☐ Parent of voter's spouse
- ☐ Child of voter's spouse
- ☐ Grandparent of voter's spouse
- ☐ Grandchild of voter's spouse
- ☐ Sibling of voter's spouse
- ☐ Voter's legal guardian
- ☐ Designee for a voter with a disability

Designee's Signature: _____ **Date:** _____/_____/_____
The voter directly instructed me to make this request for them.

AFFIDAVIT
STATE OF FLORIDA
COUNTY OF PINELLAS

I, Marianne Segal, am over the age of 18 and do swear the following:

1. I am a resident of Pinellas County, Florida. My current address is:

2416 World Parkway Blvd #14 Clearwater, FL. 33763

2. On July 16, 2024, I received a vote-by-mail ballot for the primary election on August 20th, 2024 at my residence. (Date Received the Vote By Mail Ballot)

3. I did not request a vote-by-mail ballot for the 2024 Primary Election on June 23, 2024, which is the date Pinellas County Supervisor of Elections is showing that I requested my vote by mail ballot.

4. I have not authorized anyone to request a vote-by-mail ballot on my behalf.

5. I have confirmed with the Supervisor of Elections that my name was included in the list of voters who were sent vote-by-mail ballots for the 2024 Primary Election.

6. I did not sign or file a DS-DE 160 Form requesting a Vote-By-Mail Ballot. Ex. A.

7. Upon information and belief and to the best of my knowledge, this vote-by-mail ballot was sent to me unlawfully, and without my request or authorization.

8. I am concerned about the integrity of my voter registration information and request that this matter be investigated to prevent any potential voter fraud or errors, and I file this affidavit in good-faith with no other intention.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on Aug 24, 24, 2024.

Signature

Marianne Segal
Full Name

STATE OF FLORIDA
COUNTY OF Pinellas

Sworn to (or affirmed) and subscribed before me by means of ☑ physical presence or ☐ online notarization, this 24th day of August, 2024, by Marianne Segal.

(Signature of Notary Public Florida)

Christine Peters
(Print, Type, or Stamp Commissioned Name of Notary Public)

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

Personally Known ☑ OR
Produced Identification ☐

Type of Identification Produced

Filing # 221001287 E-Filed 04/15/2025 02:48:37 AM

IN THE DISTRICT COURT OF APPEAL
SECOND DISTRICT OF FLORIDA

CASE NO.: 2D2024-2687
CASE NO.: 2D2024-2688
(L.T. Case Nos.: 24-003717-CI and 24-003995-CI)

CHRISTOPHER GLEASON,
Appellant,

v.

JULIE MARCUS, in her official capacity as
Supervisor of Elections for Pinellas County, et al.,
Appellees.

MOTION TO VACATE ALL ORDERS ISSUED BY DISQUALIFIED JUDGES BASED ON STRUCTURAL ERROR AND VOID JUDICIAL ACTS

COMES NOW Appellant, Christopher Gleason, pro se, pursuant to Florida Rule of Appellate Procedure 9.600(a), Florida Rule of General Practice and Judicial Administration 2.330(i), and controlling state and federal case law, and respectfully moves this Honorable Court to vacate all orders issued by Judges Patricia Muscarella, Shawn Crane, Peter Ramsberger, and any Second District Court of Appeal (2DCA) judges who appear in the underlying election records that form the factual basis of this litigation. These rulings are void ab initio due to mandatory disqualification requirements, structural errors and judicial bias. In support, Appellant states:

I. LEGAL STANDARD

1. Florida law is clear that any judicial act taken by a disqualified judge is a nullity. In *Dura-Stress, Inc. v. Law*, 634 So. 2d 769, 770 (Fla. 5th DCA 1994), the court held:

"If a motion to disqualify a judge is legally sufficient, and that judge thereafter enters an order in the case, the order is void ab initio."

2. Florida Rule of General Practice and Judicial Administration **2.330(i)** mandates that if a judge is disqualified, "the judge shall take no further action in the proceeding."

3. The Florida Supreme Court has stated that "[i]t is not the judge's perception of fairness that controls, but rather the party's objectively reasonable fear that he or she will not receive a fair trial." (*Livingston v. State*, 441 So. 2d 1083, 1086 (Fla. 1983)).

4. At the federal level, the U.S. Supreme Court has long held that structural judicial error violates due process and renders all resulting rulings constitutionally infirm. See:

- *Tumey v. Ohio*, 273 U.S. 510 (1927) (judge with a personal stake in outcome violates due process);
- *Ward v. Village of Monroeville*, 409 U.S. 57 (1972) (systemic judicial bias invalidates court proceedings);
- *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009) (due process requires recusal in extreme cases of potential bias).

5. These federal authorities make clear that judicial participation by conflicted or personally involved judges constitutes structural error that is not subject to harmless error analysis and demands automatic vacatur.

II. FACTUAL BACKGROUND

6. Judges Patricia Muscarella, Shawn Crane, and Peter Ramsberger each presided over portions of the lower tribunal proceedings in Case Nos. 24-003717-CI and 24-003995-CI.
7. Each judge subsequently entered one or more substantive orders, including sealing orders, discovery rulings, and orders denying motions to disqualify.
8. Appellant has presented sworn affidavits and official Florida election records from the Florida Division of Elections showing that all three judges

appear by name as material witnesses to, and/or victims of, and/or close relations to material witness to, and/or victims of the alleged illegal vote-by-mail request scheme involving 219,673 unlawfully generated ballots on Sunday, June 23, 2024.

9. These facts were timely brought to the court's attention in verified motions to disqualify, which were summarily denied without factual findings or evidentiary hearings, in violation of Rule 2.330 and binding precedent.

III. GROUNDS FOR VACATUR

10. Judges are disqualified by law when they are:

- Material witnesses, as per Fla. R. Gen. Prac. & Jud. Admin. 2.330(d)(2);
- Victims of alleged criminal acts under investigation in the proceeding;
- Participants or beneficiaries of the subject matter at issue.

11. Canon 3E(1) of the Florida Code of Judicial Conduct requires disqualification whenever the judge's impartiality might reasonably be questioned.

12. The continued participation of these judges despite their direct or apparent involvement in the disputed election irregularities constitutes structural judicial error, triggering vacatur of all rulings. See also:

- *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332, 1335 (Fla. 1990);
- *Rose v. State*, 601 So. 2d 1181 (Fla. 1992);
- *Tumey v. Ohio*, 273 U.S. 510 (1927);
- *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009).

IV. VOID ACTS CANNOT BE SALVAGED

13. A judge who is legally disqualified has no jurisdiction to act further in the matter. Orders issued in violation of disqualification rules are:

- Void, not merely voidable;
- Subject to collateral attack at any stage;
- Invalid without regard to harmless error doctrine.

14. The structural nature of this disqualification—arising from judges being personally impacted by the fraud alleged in the case—removes any discretion or judicial immunity from review.

V. EXTENSION TO APPELLATE RULINGS

15. Upon information and belief, at least eight (6) judges currently serving on the Second District Court of Appeal (2DCA)—including one or more judges

who have issued orders in this case—are also listed as material witnesses to, and/or are victims of, and/or are conflicted due to professional and financial interests in the outcome of the elections impacted by the same June 23, 2024 and September 9, 2024 vote-by-mail fraud records obtained from the Florida Division of Elections.

16. To the extent that any orders have been issued by a judge with a direct personal interest or conflict in the underlying controversy, those appellate rulings are equally void ab initio under the principles outlined in *Dura-Stress*, *Caperton*, and *Ward v. Monroeville*, 409 U.S. 57 (1972).

17. The evidence makes clear that this is not a theoretical concern. It is a legally documented breakdown in the integrity of the vote-by-mail process that directly affects the composition of the reviewing tribunal. When a judge fails to recuse under circumstances where their impartiality may reasonably be questioned—and where they are a material witness or victim of the very conduct under appellate review—the resulting proceedings are fundamentally unfair. Such non-recusal constitutes a violation of due process under the Fourteenth Amendment, as reaffirmed in Tumey v. Ohio, 273 U.S. 510 (1927), where the U.S. Supreme Court held that even a potential conflict of interest on the part of a judge violates due process, and in In re Murchison, 349 U.S. 133 (1955), where the Court emphasized that

'no man can be a judge in his own case' and condemned proceedings that carry even the appearance of partiality. Disqualification and vacatur are therefore constitutionally required, as no harmless error review can cure this defect.

18. The Appellant reserves the right to challenge all such rulings as constitutionally defective and respectfully requests that this Court:

- Identify and vacate any 2DCA orders issued by conflicted judges;
- Assign the case to a neutral appellate panel not listed in the election fraud record;
- Certify the issue of structural bias for further review if needed.

VI. RELIEF REQUESTED

WHEREFORE, Appellant respectfully requests that this Court:

1. Declare that all orders issued by Judges Patricia Muscarella, Shawn Crane, Peter Ramsberger, and any conflicted 2DCA judges are void ab initio;
2. Vacate and strike those orders from the record, including but not limited to:
    - Sealing orders (Docket #57 and #64),

- Orders denying judicial disqualification,
- Any rulings affecting discovery or public records access,
- Any appellate orders rendered by conflicted 2DCA judges;

3. Order the Clerk of the Circuit Court and Clerk of the Second DCA to certify and provide a list of all rulings entered by disqualified judges for formal vacatur;

4. Reassignment, transfer to another DCA, or Supreme Court certification (Art. V, § 2(b), Fla. Const.). Grant any other relief this Court deems just and necessary to preserve judicial integrity and due process.

Respectfully submitted this 14th day of April, 2025.

/s/ Christopher Gleason
Christopher Gleason
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing Motion to Disqualify Judge Nelly N. Khouzam was served via the Florida Courts E-Filing Portal, or by U.S. Mail and/or email where appropriate, on April 14, 2025, to the following:

- Clerk of the Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- Clerk of the Sixth District Court
- The Honorable Judge Nelly N. Khouzam, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- The Honorable Judge Morris Silberman, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- The Honorable Judge Craig C Villanti, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- The Honorable Judge Anthony C. Black, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- The Honorable Judge Edward C. LaRose, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- The Honorable Judge Susan H. Rothstein-Youakim, Second District Court of Appeal, 1700 North Tampa Street, Suite 300, Tampa, FL 33602
- Jared N. Kahn, Esq., Attorney for Appellee Julie Marcus (jkahn@pinellas.gov) (eservice@pinellas.gov)
- Kelly L. Vicari, Esq., Attorney for Appellee Julie Marcus (kvicari@pinellas.gov) (eservice@pinellas.gov)
- Jeffrey N. Klein, Esq. – Attorney for Appellee Pinellas County Canvassing Board (eservice@pinellas.gov)

CERTIFICATE OF COMPLIANCE

This motion complies with Rule 9.045(e), using 14-point Times New Roman font.

Respectfully submitted,

/s/ Christopher Gleason
Christopher Gleason
2098 Seminole Boulevard, #6212
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com, gleasonforpinellas@gmail.com
Pro Se Appellant/Petitioner

IN THE DISTRICT COURT OF APPEAL OF FLORIDA, SECOND DISTRICT

Case No.: 2D2024-2687
Consolidated With: 2D2024-2688
Lower Tribunal Case Nos.: 24-003717-CI, 24-003995-CI

CHRISTOPHER GLEASON,
Appellant/Petitioner, pro se,
v.
JULIE MARCUS, in her official capacity as Supervisor of Elections for Pinellas County, et al.,
Appellees/Respondents.

SUPPLEMENT TO APPELLANT'S MOTION TO DISQUALIFY CIRCUIT JUDGE PATRICIA MUSCARELLA AND TO VACATE ALL ORDERS ISSUED IN THE LOWER COURT PROCEEDINGS

Filed in compliance with Florida Rule of Appellate Procedure 9.225 (Supplemental Authority) and in further support of Appellant's previously filed motion under Rule 2.330(f), Florida Rules of General Practice and Judicial Administration, Appellant Christopher Gleason, pro se, respectfully submits this Supplement to disqualify Circuit Judge Patricia Muscarella and vacate all prior orders issued in the lower tribunal due to newly discovered, material evidence and binding constitutional precedent.

I. Newly Discovered Evidence: Protected Voter System Block Confirms Fraud in Judge Muscarella's Vote-by-Mail Record

Judge Patricia Muscarella is a protected voter under § 97.0585, Florida Statutes, a designation that shields judicial officers' voter records and imposes specific technological restrictions on the submission of vote-by-mail (VBM) requests.

Internal documentation from VR Systems' Voter Focus software confirms that:

- Protected voters are blocked from submitting VBM requests via the public website;
- These requests must be processed manually by credentialed elections staff after verifying multiple identifiers;
- Unauthorized online VBM requests made on behalf of protected voters require an override, which is auditable and logged.

Despite these limitations, the official vote-by-mail request log from the Florida Division of Elections indicates that a request was submitted for Judge Muscarella on Sunday, June 23, 2024 — a day

when the Supervisor of Elections office was closed. This fact alone confirms that:

- Judge Muscarella could not have submitted the request herself;
- Her identity was misused, or her record was accessed without authorization;
- She is therefore a material witness to, direct victim of, a participant in, and /or a beneficiary of the fraud alleged in the underlying litigation.

II. Affidavit of John Siamas Confirms Functional Impossibility of Protected Voter VBM Web Access

Attached as Exhibit Z is the Sworn Affidavit of John Siamas, a protected voter and 2024 Florida State Senate candidate, executed on April 28, 2025. Mr. Siamas attests that he attempted to request a VBM ballot through the Pinellas County Supervisor of Elections website using his accurate credentials. The system blocked the request and returned the following message:

"The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance."

The affidavit confirms:

1. Protected voters are categorically prevented from submitting online VBM requests;
2. Such submissions can only be completed via manual phone-based methods with identity verification;
3. A request appearing under Judge Muscarella's name in the VBM log must have resulted from manual override, credential misuse, or unauthorized access.

This sworn testimony establishes that Judge Muscarella's VBM record was compromised, and that she is a material witness and factual participant in the exact scheme subject to this appeal.

III. Legal Grounds for Disqualification and Vacatur of Orders

Disqualification is mandatory under:

- Rule 2.330(d)(1), Florida Rules of General Practice and Judicial Administration, which requires disqualification where the judge is a material witness;
- Canon 3E(1)(a), Florida Code of Judicial Conduct, which requires disqualification when impartiality might reasonably be questioned;
- Florida Statutes § 38.10, which allows for statutory disqualification where justice so requires.

IV. Binding Constitutional Authority

Disqualification and vacatur are further compelled under U.S. Supreme Court precedent:

1. **Caperton v. A.T. Massey Coal Co., 556 U.S. 868, 872 (2009)**

"The Due Process Clause requires recusal when the probability of actual bias on the part of the judge or decisionmaker is too high to be constitutionally tolerable."

2. **Williams v. Pennsylvania, 579 U.S. 1, 9 (2016)**

"An unconstitutional failure to recuse constitutes structural error — a defect not amenable to harmless-error review."

3. **In re Murchison, 349 U.S. 133, 136 (1955)**

"Our system of law has always endeavored to prevent even the probability of unfairness."

4. **Tumey v. Ohio, 273 U.S. 510, 523 (1927)**

"It certainly violates the Fourteenth Amendment… to subject [a party] to the judgment of a court, the judge of which has a direct, personal, substantial pecuniary interest in reaching a conclusion against him."

5. **Weaver v. Massachusetts, 137 S. Ct. 1899, 1907 (2017)**

"Structural errors affect the framework within which the trial proceeds… and require automatic reversal because they infect the entire trial process."

V. Request for Relief

WHEREFORE, Appellant respectfully requests that this Honorable Court:

1. Immediately disqualify Judge Patricia Muscarella from all further proceedings in these consolidated matters;
2. Vacate all orders issued by Judge Muscarella as constitutionally void under the structural error doctrine;
3. Order the reassignment of the court cases to a neutral and untainted judicial officer;
4. Grant such other and further relief as justice, equity, and the Florida and U.S. Constitutions require.

CERTIFICATE OF GOOD FAITH

I HEREBY CERTIFY that this supplemental motion is filed in good faith, not for purposes of delay, and based upon newly discovered evidence not previously available at the time of the original filing.

Respectfully submitted,
This 29th day of April, 2025.

/s/ Christopher Gleason

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing, along with Exhibits A, B, X, Y, Z, was furnished via email and the Florida Courts E-Filing Portal on April 29, 2025, to:

Clerk of the Second District Court of Appeal

Julie Marcus, Supervisor of Elections, Pinellas County

Dustin Chase, Deputy Supervisor of Elections

Matt Smith, General Counsel, Supervisor of Elections

Kelly L. Vicari, Esq., Jared Kahn, Esq., Jeffrey Klein, Esq., Attorneys for Appellees

/s/ **Christopher Gleason**

Exhibit	Description
A	Daily Vote By Mail Early Voting Log – Protected Voters
B	Voter Focus – Protected Voter Web Block
X	Muscarella VBM Log Entry – June 23, 2024
Y	Screenshot of Online Request Denial Message
Z	Affidavit of John Siamas – Protected Voter Access Denied (4/28/25)

EXHIBIT A

Daily Vote By Mail Early Voting Log – Protected Voters

Recor	Count	VoterIdNumb	ElectionNu	ElectionDa	ElectionNa	LastRecordC	Vote	RequesteDat	Delivery Dat	BallotReturn	Req	Mili	Ove	Mil	Pre	Pre	Co	Se	Ho	Co	Sch	Otl	Party	Voter Name	Maili	Mail	Maili	Mailir	Maili	Mail	Mailin	E-mail	Add	Fax	Desi	Des	Voter	FLDL/StateID	VoterSSN4
VBM	PIN	106876672	43887	45524	2024	Prim	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	Y	N	Y									NPA	COLEMAN, SHERWOOD S													N		N
VBM	PIN	107374929	43887	45524	2024	Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N									REP	CROFF, DIANE M													N		N
VBM	PIN	111215604	43887	45524	2024	Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N									REP	DITTMER, ROBERT G								ROBDITTM					N		N
VBM	PIN	107149377	43887	45524	2024	Prim	8/11/2024	P	6/23/2024	7/16/2024		N	N	N									REP	DUBBELD, JENNIFER C								DUBB80@					N		N
VBM	PIN	106986554	43887	45524	2024	Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N									REP	FEDERICO, PHILIP J													N		N
VBM	PIN	107285314	43887	45524	2024	Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N									REP	GNAGE, BRIAN E								bgnage@G					N		N
VBM	PIN	106995645	43887	45524	2024	Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N									REP	GRISSINGER, HOLLY T								grissingerl					N		N
VBM	PIN	107366706	43887	45524	2024	Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N									NPA	JACK, ELIZABETH M													N		N
VBM	PIN	106993896	43887	45524	2024	Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N									NPA	KELLY, LORRAINE M								LORRAINE					N		N
VBM	PIN	106723453	43887	45524	2024	Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N									REP	KHOUZAM, NELLY N													N		N
VBM	PIN	107338189	43887	45524	2024	Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N									REP	LOAR, DONEENE D								DONEENE					N		N
VBM	PIN	107285166	43887	45524	2024	Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N									DEM	LUCAS, CHERYL L								CHERYLLU					N		N
VBM	PIN	107150747	43887	45524	2024	Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N									NPA	MASTERSON, VICKI A								lmkiki@ho					N		N
VBM	PIN	107385240	43887	45524	2024	Prim	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N									REP	MATTHEY, PHILIPPE													N		N
VBM	PIN	106958587	43887	45524	2024	Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N									DEM	MOORE, PATRICE W								pwmoore1					N		N
VBM	PIN	106784723	43887	45524	2024	Prim	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N									REP	MUSCARELLA, PATRICIA A								tmuscarel					N		N
VBM	PIN	107071107	43887	45524	2024	Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N									REP	NEWTON, CYNTHIA J													N		N
VBM	PIN	100554220	43887	45524	2024	Prim	8/10/2024	P	6/23/2024	7/16/2024		N	N	N									REP	PEARLMAN, NICOLE M								NPEARLM					N		N
VBM	PIN	106815101	43887	45524	2024	Prim	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N									REP	PIERCE, JAMES V								jamesvinc					N		N
VBM	PIN	107171797	43887	45524	2024	Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N									DEM	RAMSBERGER, ANGELA M								ANGRAMS					N		N
VBM	PIN	107143704	43887	45524	2024	Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N									NPA	RAMSBERGER, THOMAS M								TOMRAMS					N		N
VBM	PIN	106991733	43887	45524	2024	Prim	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N									REP	RIBA, JOSHUA B								JRIBA01@I					N		N
VBM	PIN	106869196	43887	45524	2024	Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N									NPA	SILBERMAN, MORRIS													N		N
VBM	PIN	107328087	43887	45524	2024	Prim	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N									NPA	ST JOHN, SUSAN													N		N
VBM	PIN	106750878	43887	45524	2024	Prim	6/25/2024	P	6/23/2024	7/16/2024		N	N	N									REP	STEARNS, JAMES R								astearns63					N		N
VBM	PIN	106869683	43887	45524	2024	Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N									REP	TODD, KIMBERLY P								KIMPH@LI					N		N
VBM	PIN	113787369	43887	45524	2024	Prim	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N									NPA	VILLANTI, CRAIG C								CCVILLAN					N		N
VBM	PIN	106972664	43887	45524	2024	Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N									REP	WESTINE, LAURALEE G								lwestine@					N		N
VBM	PIN	106715884	43887	45524	2024	Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N									REP	WILLIAMS, AMY M													N		N
VBM	PIN	106741060	43887	45524	2024	Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N									REP	BARTLETT, BRUCE L								BBARTLET					N		N
VBM	PIN	103848463	43887	45524	2024	Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N									REP	JUPITER, VERONICA L								veronica.l					N		N
VBM	PIN	111191787	43887	45524	2024	Prim	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N									REP	KAHN, JARED D								jaredkahn					N		N
VBM	PIN	106821566	43887	45524	2024	Prim	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N									REP	LENAS, JAMES S													N		N
VBM	PIN	107075643	43887	45524	2024	Prim	7/23/2024	V	6/23/2024	7/16/2024	7/23/2024	N	N	N									REP	MARCUS, JULIE K													N		N
VBM	PIN	107265658	43887	45524	2024	Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N									DEM	VICARI, BRANDEN M								BVICARI12					N		N
VBM	PIN	106965157	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N									REP	ABELA, BARBARA A													N		N
VBM	PIN	106944466	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N									REP	ABELA, CHARLES								CABEKA19					N		N
VBM	PIN	106858031	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N									REP	ACCETTA, CLAUDIA L								JCACCETT					N		N
VBM	PIN	106810721	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N									REP	ACCETTA, JOSEPH F								JCACCETT					N		N
VBM	PIN	127947889	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N									NPA	ACEVEDO VERGES, MICHE													N		N
VBM	PIN	106861024	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N									DEM	ADAMS, RANDY L								RLADAMS(					N		N
VBM	PIN	106856853	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N									DEM	ADDEO, ALICIA													N		N
VBM	PIN	106854537	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N									REP	AFIENKO, KENNETH J													N		N
VBM	PIN	107127247	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N									REP	AGNEW JR, EUGENE W								WAGNEW(					N		N
VBM	PIN	107127248	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N									DEM	AGNEW, CAROLE A								CAAGNEW					N		N
VBM	PIN	122763287	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/16/2024		Y	N	N									REP	ALAMEDA, DIEGO								DIEGOAL5					N		N
VBM	PIN	107385131	43887	45524	2024	Prima	7/19/2024	V	6/23/2024	7/16/2024	7/19/2024	N	N	N									REP	ALAMEDA, JORGE L													N		N
VBM	PIN	106966535	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N									REP	ALFONSO, DIANA P								DALFONS1					N		N
VBM	PIN	106966537	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N									REP	ALFONSO, ROBERT								BOBA1749					N		N
VBM	PIN	122597490	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/16/2024		Y	N	Y									DEM	ALGREN, EMMA D								EFDORTCH					N		N
VBM	PIN	116063247	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/16/2024		Y	N	N									REP	ALGREN, GREGORY A								GAALGREN					N		N
VBM	PIN	106865188	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N									DEM	ALLAN, LINDA R								LRARCSD(					N		N
VBM	PIN	106804401	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N									REP	ALLEN, MARGARITA B													N		N
VBM	PIN	107192464	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N									REP	ALLEN, ROBIN C													N		N
VBM	PIN	106859241	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N									REP	ALLEN, STEPHEN W								sallen867(					N		N
VBM	PIN	106965402	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N									REP	ALLEN, STEVEN D								goofusmax					N		N
VBM	PIN	106947907	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N									REP	ALLEN, TAMMY L								thecracker					N		N
VBM	PIN	107216080	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N									NPA	ALMEIDA, MEGAN A													N		N
VBM	PIN	107878785	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N									REP	ALONSO, ISAIAH D								IALONSO1					N		N

VBM	PIN	118844481	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	DEM	ALPERT, JORDAN M			N	N
VBM	PIN	126348848	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	ALVARADO, NICOLE E	nic.a003@		N	N
VBM	PIN	107251143	43887	45524	2024	Prima	8/6/2024	U	6/23/2024	7/16/2024		N	N	N	DEM	ANDERSON, JULIE M	julie@shel		N	N
VBM	PIN	107202006	43887	45524	2024	Prima	8/2/2024	U	6/23/2024	7/22/2024		N	N	N	NPA	ANDERSON, MARK H	MHAMARK		N	N
VBM	PIN	106787094	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	ANDERSON, SUE M	smandersc		N	N
VBM	PIN	123597321	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	ANDERSON, THERESA M			N	N
VBM	PIN	106955366	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	DEM	ANDREWS, JEANENE S	andrewsje		N	N
VBM	PIN	106696199	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	ANDREWS, JOAN C	HORACEAI		N	N
VBM	PIN	106957430	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	ANDREWS, MERI E			N	N
VBM	PIN	106849899	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	ANDRINGA, BEVERLY J			N	N
VBM	PIN	106686523	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	NPA	ANDRINGA, HENRY J			N	N
VBM	PIN	125823606	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	Y	N	Y	NPA	ANGELOSANTO, SARA M	SARAANGE		N	N
VBM	PIN	130196639	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	ANTONAKLAS, GEORGE E			N	N
VBM	PIN	116775806	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	ARCHIBALD, AMY V			N	N
VBM	PIN	107343822	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	ARKLES, DAVID S	davidarkle		N	N
VBM	PIN	107115073	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	DEM	ARMISTEAD III, EARNEST S	FBINAA21		N	N
VBM	PIN	107245222	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	ARNEY, JOSHUA P	JOSHUAAR		N	N
VBM	PIN	106996477	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	ARNEY, LAUREN E	LAURENAF		N	N
VBM	PIN	112888181	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	ARROJO GNAGE, ANN KRIS	karrojo@gr		N	N
VBM	PIN	105181336	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	ASHCOM, TIFFANY J	TASHCOM:		N	N
VBM	PIN	120763363	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	ASTI, DAVID C			N	N
VBM	PIN	120305547	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	ASTI, JASKIRAT K			N	N
VBM	PIN	110472714	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	NPA	ATCHISON, ANITA W			N	N
VBM	PIN	106867748	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	NPA	ATCHISON, RANDY B			N	N
VBM	PIN	115525428	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	REP	AUGUSTIN, SHANNON F	saugustin9		N	N
VBM	PIN	100530359	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	REP	AUNGST, CARY AS	CARYA84@		N	N
VBM	PIN	106764299	43887	45524	2024	Prima	7/23/2024	V	6/23/2024	7/16/2024	7/23/2024	N	N	N	DEM	BABSKI, ANTONIA G	TONIANTO		N	N
VBM	PIN	107095848	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	BACKUS, KAREN			N	N
VBM	PIN	114102073	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	Y	N	Y	DEM	BAGLEY, AMY M	BAGLEY.BA		N	N
VBM	PIN	106685585	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	BAGLEY, PETER W	BAGLEY.BA		N	N
VBM	PIN	106697718	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	NPA	BAIRD, WILLIAM D			N	N
VBM	PIN	106890151	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BARBIERI, MARC D			N	N
VBM	PIN	106835270	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BARBIERI, PATRICIA G			N	N
VBM	PIN	106953456	43887	45524	2024	Prima	8/6/2024	V	6/23/2024	7/16/2024	8/6/2024	N	N	N	REP	BAREFOOT, PATRICIA A			N	N
VBM	PIN	107124734	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	BARILE, KATHRYN A			N	N
VBM	PIN	118284470	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	BARKER, EARL J			N	N
VBM	PIN	102960163	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	BARKLEY, JOHN F	JOHNBARK		N	N
VBM	PIN	103010293	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	BARKLEY, MICHELLE L	MYSHELLY		N	N
VBM	PIN	106858698	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	NPA	BARNA, JOHN C	JOHNBARN		N	N
VBM	PIN	107263783	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	BARNETT, ERIN K	NERNIN33		N	N
VBM	PIN	114130057	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	BARRY, AMANDA T			N	N
VBM	PIN	106802252	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	BARRY, DOUGLAS M	BARRY5_3		N	N
VBM	PIN	106775657	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	BARRY, WENDY L			N	N
VBM	PIN	106880659	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	BARTON, DEBRA A			N	N
VBM	PIN	107059744	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BATES, DARLENE R	DARLENEB		N	N
VBM	PIN	106952878	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BATES, RICHARD C	RBATES26		N	N
VBM	PIN	116553760	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	BAUMAN, MICHELLE M	MICHELLE		N	N
VBM	PIN	106724067	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	BEACHAM, CHRISTINE	CWBEACH		N	N
VBM	PIN	115223786	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	BECK, MARGARET A	BECK.MAR		N	N
VBM	PIN	106934105	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	BELL JR, KENNETH L			N	N
VBM	PIN	111375724	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	BELL, KEISHA A			N	N
VBM	PIN	106817378	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	BELL, SUSAN M			N	N
VBM	PIN	113331393	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	REP	BELLINO, CHARLES D	VBELLINO		N	N
VBM	PIN	113301494	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	REP	BELLINO, VICKI L	VBELLINO		N	N
VBM	PIN	106808588	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BELSON, JANE E	belson5@a		N	N
VBM	PIN	107445660	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	BELVIS, EDWIN	EBELVIS@A		N	N
VBM	PIN	107332722	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	DEM	BELVIS, KRISTOPHER E	KEB0116@		N	N
VBM	PIN	107197247	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	BELVIS, RENEE M			N	N
VBM	PIN	120519597	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	BENEDEK, DANIEL C	dani.b.500		N	N
VBM	PIN	118638147	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	BENEDEK, LESLIE M	lmbenedek		N	N

VBM	PIN	107218861	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	BENINCASA, TERRI	TERRI@BE	N	N
VBM	PIN	106598248	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	BENNETT III, JOHN E	BUCFAN5(	N	N
VBM	PIN	106904040	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	BENNION, BETH S		N	N
VBM	PIN	106976046	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	BERG, JEFFREY M	JBERGTWI	N	N
VBM	PIN	106734047	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	BERKHEIMER, GARY C		N	N
VBM	PIN	107326515	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	BERNARDINI JR, PAUL A	PAUL_BER	N	N
VBM	PIN	106787011	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BERUTTI, GINA M	FREELANZ	N	N
VBM	PIN	107107512	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	BETTKER-NICHOLSON, AM	ABETTKER(	N	N
VBM	PIN	106775908	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	BEVILL, SHIRLEY F	ANSHIBER	N	N
VBM	PIN	125369892	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BIELER, LAUREL L	ZINA674@	N	N
VBM	PIN	106764398	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	DEM	BINFIELD, BEVERLY A	BEVBINFIE	N	N
VBM	PIN	107188972	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	BISHARA, MARIANE	docmb10@	N	N
VBM	PIN	107210495	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BLANCHETTE, HEATHER D		N	N
VBM	PIN	107209284	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BLANCHETTE, SCOTT M	SMB27@TA	N	N
VBM	PIN	115484454	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	BLEY, TIMOTHY C	TIMOTHY.E	N	N
VBM	PIN	106867070	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	DEM	BLOSSOM, MAURICE D		N	N
VBM	PIN	106826838	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	DEM	BOBERG, MAUREEN E	MAUREENI	N	N
VBM	PIN	106813226	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	BOCK, PHILIP L	81PBOCK@	N	N
VBM	PIN	106994594	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	BOCK, TRACY A	81TBOCK@	N	N
VBM	PIN	107440590	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	NPA	BOICE, KATHLEEN J		N	N
VBM	PIN	120532455	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	BOITMANN, AYLIE A	bobaylie@	N	N
VBM	PIN	120532423	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	BOITMANN, ROBERT J	bobaylie@	N	N
VBM	PIN	124412703	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	BOOR, JULIANNA M	IndyGT69@	N	N
VBM	PIN	124412802	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	BOOR, RAYMOND B	jhawker44(	N	N
VBM	PIN	106816488	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	BORLAND JR, LAWRENCE D	EARNHART	N	N
VBM	PIN	107361787	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	NPA	BOTTIE, SHPRESA I	EXSPRESA	N	N
VBM	PIN	107074052	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	IND	BOURNE, TRACEY R	MSQUICKV	N	N
VBM	PIN	120976930	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BOWERS, EARL M	EARLBOWI	N	N
VBM	PIN	121017691	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BOWERS, NENA M	NANABOW	N	N
VBM	PIN	107305027	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BOWMAN, JOLEEN R		N	N
VBM	PIN	106837518	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	BOYER, KAY L		N	N
VBM	PIN	106881953	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BRACALENTO, THOMAS J		N	N
VBM	PIN	107300686	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	BRADLEY JR, MAURICE M	bigmo282	N	N
VBM	PIN	106768359	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	BRADY, PATRICIA M	pbrady013	N	N
VBM	PIN	106779447	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	REP	BRAHM, KEITH A		N	N
VBM	PIN	115900734	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	BRAZELTON, KAREN R	kr.brazelto	N	N
VBM	PIN	106881774	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	REP	BREECH, MERLE C		N	N
VBM	PIN	106832556	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	DEM	BRIGGS, JOYCE A	jdustymay	N	N
VBM	PIN	128473784	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	BRISSETTE, RICHARD A	rickbrisset	N	N
VBM	PIN	105377098	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	BROCKMAN III, WILLIAM F	BROCKMA	N	N
VBM	PIN	105328079	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	Y	N	Y	REP	BROCKMAN, AIMEE J	emailaime	N	N
VBM	PIN	106878908	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	NPA	BROCKMAN, TIMOTHY T	TBROCKM/	N	N
VBM	PIN	107038145	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	BRODERICK, TONIA M	TONIAbrod	N	N
VBM	PIN	106844625	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	BRODEUR, CHRIS R	CBRODEU	N	N
VBM	PIN	107104964	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BROOKS, COLIN L	BROOKS.C	N	N
VBM	PIN	100293005	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BROOKS, ERIN H	brookserin	N	N
VBM	PIN	106805104	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	BROOKS, PATRICIA H	PBROOKS1	N	N
VBM	PIN	106672967	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	BROOKS, THOMAS G	TBROOKS4	N	N
VBM	PIN	106787344	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	BROWN, ELIZABETH J		N	N
VBM	PIN	106985620	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	BROWN, GARY A		N	N
VBM	PIN	106908066	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	BROWN, TIMOTHY M	BROWNTIM	N	N
VBM	PIN	105932617	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	8/6/2024	8/19/2024	Y	N	N	NPA	BROWNE, KELLEN R		N	N
VBM	PIN	104682948	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	8/6/2024	8/19/2024	Y	N	N	REP	BROWNE, LAUREN E		N	N
VBM	PIN	106751258	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	BROWNING, ROBERT E	BROWNIES	N	N
VBM	PIN	107128150	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BRUNDAGE, PATRICIA L	PBRUNDA(	N	N
VBM	PIN	106892762	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	BRUNEAU, MARGARET V	WHATSUPI	N	N
VBM	PIN	106822561	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	IND	BRUNETTO, MONICA R		N	N
VBM	PIN	106908707	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	DEM	BRUNI JR, JOSEPH V	JBRUNI3@	N	N
VBM	PIN	114964118	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	NPA	BRUNI, TAMMY R	TAMMY.BR	N	N
VBM	PIN	106926210	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BUCKLEY, RYAN E	RYANB515	N	N

VBM	PIN	107441745	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	BUFO, ARTHUR J	WORKING(	N	N
VBM	PIN	107445758	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	BUFO, KATHY L	KATHYBUF	N	N
VBM	PIN	106930370	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	NPA	BUONOMO, THOMAS R	tbuonomo(	N	N
VBM	PIN	106980359	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	BURGESS III, WILLIAM H	WILLIAMHI	N	N
VBM	PIN	106980338	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	BURGESS, COLLETTE P		N	N
VBM	PIN	106924311	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	BURKE, CHRISTOPHER L	CLBURKE2	N	N
VBM	PIN	107330911	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BURKETT, RYAN E	moshride2	N	N
VBM	PIN	106809613	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BURNS, JOSEPH G		N	N
VBM	PIN	106978154	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BUSH, MICHAEL P		N	N
VBM	PIN	106812725	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	BUSHMAN, KATHY S		N	N
VBM	PIN	106816248	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	BUTTS, MICHAEL A		N	N
VBM	PIN	128542603	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	CALDERWOOD, IAN S	icalderwoc	N	N
VBM	PIN	107167732	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	CAMPBELL, KIMBERLY A	KIMCAMPE	N	N
VBM	PIN	106809751	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	CAMPBELL, NANCY B	NBCPCSO(	N	N
VBM	PIN	106758700	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	CAMPBELL, PAMELA AM		N	N
VBM	PIN	118241711	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	CANTRELL, JASON R		N	N
VBM	PIN	107020583	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	CAPEHART, ESPER T	FREDDIEC.	N	N
VBM	PIN	106911360	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	Y	N	N	REP	CARABALLO, MARTINE L	RBROWN6	N	N
VBM	PIN	124039193	43887	45524	2024	Prima	7/29/2024	U	6/23/2024	7/16/2024		N	N	N	REP	CARASSAS, CHRISTINA V	CHRISTINA	N	N
VBM	PIN	106835464	43887	45524	2024	Prima	8/15/2024	P	6/23/2024	7/16/2024		N	N	N	REP	CARASSAS, JOHN	CARASSAS	N	N
VBM	PIN	106893090	43887	45524	2024	Prima	7/29/2024	U	6/23/2024	7/16/2024		N	N	N	REP	CARASSAS, KATHERINE	CARASSAS	N	N
VBM	PIN	107139370	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	CARBALLO, CATHERINE M	john33756	N	N
VBM	PIN	107138713	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	CARBALLO, JOHN D		N	N
VBM	PIN	107155653	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	CAREY, DEANNA L	lilstar5020	N	N
VBM	PIN	107097701	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	CAREY, PAUL T	PCAREY16	N	N
VBM	PIN	107242155	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	CARLSEN, CHRISTOPHER A	CCARLSEN	N	N
VBM	PIN	107233725	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	NPA	CARLSEN, FRANCESCA	FCARLSEN	N	N
VBM	PIN	125697882	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	CARLSON, HUNTER L	hunterc@t	N	N
VBM	PIN	106790103	43887	45524	2024	Prima	7/30/2024	V	6/23/2024	7/19/2024	7/30/2024	N	N	N	REP	CARNELL, DALE R	DETDIRK@	N	N
VBM	PIN	106789869	43887	45524	2024	Prima	7/30/2024	V	6/23/2024	7/19/2024	7/30/2024	N	N	N	REP	CARNELL, MAUREEN K	VETTEGEG	N	N
VBM	PIN	107145422	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	CARNES JR, WILLIAM V	SPPD3339	N	N
VBM	PIN	106792098	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	CARNES, VALERIE S	vscarnes@	N	N
VBM	PIN	106757302	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	CARR, GIL F		N	N
VBM	PIN	106719328	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	CARR, KIMBERLY A		N	N
VBM	PIN	124378226	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	CARR, KIMBERLY A	KCARRXX6	N	N
VBM	PIN	106747261	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	CARTWRIGHT, JANET G		N	N
VBM	PIN	106726006	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	CASE, JAMES R	JIMCASE@	N	N
VBM	PIN	106763603	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	CASE, JANICE B	JCASE001(	N	N
VBM	PIN	107376257	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	CASEBER, WESLEY J	WCASEBEI	N	N
VBM	PIN	106992136	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	CASEY, TIMOTHY J		N	N
VBM	PIN	116703417	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	CASSIDY, DENNIS M	DENNISCA	N	N
VBM	PIN	122669563	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	CAUTHEN, JOHN	JOHNCAUT	N	N
VBM	PIN	115441050	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	CHAPIN, KYLE S		N	N
VBM	PIN	124663835	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	NPA	CHAVES, PHILLIP G	pgc117@h	N	N
VBM	PIN	106925482	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	CHIANCO, JOHN B	JOHNCHIA	N	N
VBM	PIN	107181439	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	NPA	CHIAPUTTI, DAREN A	DCHIAPUT	N	N
VBM	PIN	107417089	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	NPA	CHIAPUTTI, MELISSA F	sashacoco	N	N
VBM	PIN	107150724	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	CIRINCIONE, SAMUEL M	SAMUELCI	N	N
VBM	PIN	104449428	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	DEM	CIUCCI, MELISSA F	M_CIUCCI	N	N
VBM	PIN	104469310	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	CIUCCI, PETER	P_CIUCCI(	N	N
VBM	PIN	107075299	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	CLARKSON, JOHN P	JC188631(	N	N
VBM	PIN	102572537	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	CLAUS, DIANE D	dianeclaus	N	N
VBM	PIN	124637656	43887	45524	2024	Prima	7/19/2024	V	6/23/2024	7/16/2024	7/19/2024	N	N	N	DEM	CLAY, KELLY A	Kykaclady1	N	N
VBM	PIN	107321662	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	GRE	CLEMENSON, CHRISTINA E	cclemenso	N	N
VBM	PIN	106738685	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	CLEMENT, KENNETH A	RANGER-K	N	N
VBM	PIN	106735981	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	DEM	CLOSE, BARBARA W		N	N
VBM	PIN	106758950	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	COATS, CATHIE L	CATHHALT	N	N
VBM	PIN	106740649	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	COATS, JAMES F		N	N
VBM	PIN	106765584	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	COBB, MARION J	NOLESRIZI	N	N
VBM	PIN	106914008	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	COBOURNE, JULIE A		N	N

VBM	PIN	107213566	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	COBOURNE, RALPH D		N	N
VBM	PIN	106729520	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	CODERE JR, ROBERT G	bcodere@y	N	N
VBM	PIN	107090367	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	COHEN-PHILLIPS, SHANNC		N	N
VBM	PIN	106846555	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	DEM	COLBERT, JOSEPH S		N	N
VBM	PIN	106846556	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	DEM	COLBERT, SANDRA E		N	N
VBM	PIN	106751408	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	COLCORD III, WALLACE J		N	N
VBM	PIN	106763298	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	COLCORD, DONNA M		N	N
VBM	PIN	106936156	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	REP	COLE, DANIEL A	FHP1875@	N	N
VBM	PIN	107356767	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	COLEMAN, JENNIFER T		N	N
VBM	PIN	124123044	43887	45524	2024	Prima	7/5/2024	P	6/23/2024	7/5/2024		Y	Y	N	DEM	COLLAMER, ANGELIQUE	ANGIECOL	N	N
VBM	PIN	107008880	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	NPA	COLLAMORE, DARLA M	DARLA.CO	N	N
VBM	PIN	107001593	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	NPA	COLLAMORE, E. Q	Q.COLLAM	N	N
VBM	PIN	106859675	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	COLLINS, ANGELA	RILLACARE	N	N
VBM	PIN	106859956	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	COLLINS, GARY D	GEEPOP64	N	N
VBM	PIN	107077585	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	NPA	COLLINS, SARA E	SCOLLINS	N	N
VBM	PIN	119085613	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	COLLINSON, ANDREW JJ		N	N
VBM	PIN	119722892	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	NPA	COLQUHOUNE, DAVID G	DGCBIZ@\	N	N
VBM	PIN	114665180	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	NPA	COLQUHOUNE, RACHEL E	RACHELEL	N	N
VBM	PIN	107035786	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	CONAGE-POUGH, ARLENE	JASONCP@	N	N
VBM	PIN	107273393	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	CONNOLLY, CHRISTOPHEI		N	N
VBM	PIN	107071645	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	CONNOLLY, SHANNON K		N	N
VBM	PIN	116249481	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	CONNOR, DAVID J	joealamod	N	N
VBM	PIN	107284509	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	CONSTANTINE IV, WILLIAM		N	N
VBM	PIN	114199891	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	CONSTANTINE, ELIZABETH		N	N
VBM	PIN	106759605	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	COOKE, PATRICIA A	COOKIEPA	N	N
VBM	PIN	107005032	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	DEM	COOKE, SUSAN M	SMUCKETT	N	N
VBM	PIN	107041070	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	COOPER, CHRISTOPHER A		N	N
VBM	PIN	120729685	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	DEM	COOPER, DEAN M	WILLIAMSE	N	N
VBM	PIN	107129593	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	COOPMAN, KELLY R	KRCOOPM	N	N
VBM	PIN	118070204	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	COPELAND, NATASHA L	NLSHON0	N	N
VBM	PIN	107301660	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	COPPIN, NANCY J	NANCYGU	N	N
VBM	PIN	106717626	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	CORAZZA, DREW D	service@m	N	N
VBM	PIN	106826276	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	CORAZZA, MARILYN N	Marilyn@m	N	N
VBM	PIN	106873399	43887	45524	2024	Prima	7/19/2024	V	6/23/2024	7/16/2024	7/19/2024	N	N	N	DEM	CORDERO, LEOCADIO	leo1corder	N	N
VBM	PIN	107176427	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	CORNELIUS, CHRISTOPHE	cc69363@	N	N
VBM	PIN	106756031	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	CORNISH, JOSEPH W		N	N
VBM	PIN	122022543	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	CORTESE, AMANDA N	AMANDAC	N	N
VBM	PIN	121822130	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	COUGHENOUR, DANIEL J		N	N
VBM	PIN	123814526	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	COUGHENOUR, JEANETTE	WJCOUGH	N	N
VBM	PIN	106164240	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	COUGHENOUR, WILLIAM E	WJCOUGH	N	N
VBM	PIN	106753372	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	COUGHLIN, WENDY E	DOCMOMS	N	N
VBM	PIN	110830077	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	COX, GENA L	businessbi	N	N
VBM	PIN	100555942	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	COX, KATHERINE L	KCOX826@	N	N
VBM	PIN	107272635	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	CRAIG, GRANT K		N	N
VBM	PIN	107277729	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	CRAMER, ALEX L		N	N
VBM	PIN	106691833	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	CRAMER, JUDY W		N	N
VBM	PIN	106691834	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	CRAMER, KENNETH L	KCRAMERS	N	N
VBM	PIN	106833384	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	CRAMER, TINA M		N	N
VBM	PIN	106798487	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	CRANE, MICHELE A		N	N
VBM	PIN	116643103	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	NPA	CRAWFORD, JOHN A		N	N
VBM	PIN	107235606	43887	45524	2024	Prima	7/23/2024	V	6/23/2024	7/16/2024	7/23/2024	N	N	N	NPA	CREIGHTON, GEORGE M		N	N
VBM	PIN	106858596	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	DEM	CREWS, HOPE N	ooopgirl@y	N	N
VBM	PIN	107000417	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	CRINER, CHRISTINA D		N	N
VBM	PIN	100505467	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	CROCI, JOCELYN P	JJCROCI@'	N	N
VBM	PIN	106822193	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	REP	CRONIN, JOHN F		N	N
VBM	PIN	120947476	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	CRONIN, SERITA D	serita@tan	N	N
VBM	PIN	107098040	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	CROSBY, DONNA M	DONNACR	N	N
VBM	PIN	107098038	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	CROSBY, RONALD J	RONCROS	N	N
VBM	PIN	107194306	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	CROSBY, TIFFANY N	Tweetycros	N	N
VBM	PIN	106747515	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	CROTTY, DONALD G	DCROTTY2	N	N

VBM	PIN	107175422	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	CROTTY, MARY B	DCROTTY2	N	N
VBM	PIN	106817281	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	CROWE, DOUGLAS M	DCROWE1	N	N
VBM	PIN	106720179	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	CROWE, SUSAN S	SUSANCR(	N	N
VBM	PIN	106733592	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	DEM	CUMINGS JR, FRANCIS G		N	N
VBM	PIN	114559288	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	CURTIS, LEE S	CURTIS12(	N	N
VBM	PIN	106686479	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	CUTTING, GORDON W	gcuttin2@I	N	N
VBM	PIN	106845242	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	DABNOR, JOYCE P		N	N
VBM	PIN	107383189	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	DADETTO, ALLAN J	ADADETTO	N	N
VBM	PIN	123479265	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	DEM	DALTO, ANDRA R	fivead@gm	N	N
VBM	PIN	128729686	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	DAMANTI, MADISON H	loripuskar(	N	N
VBM	PIN	107277486	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	DANCIL, JEFFREY G		N	N
VBM	PIN	106956556	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	DANDREA, MICHELE M	dandreami	N	N
VBM	PIN	106906321	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	DARLING, EDIE B		N	N
VBM	PIN	106853891	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	DEM	DATES, JAMES A	JADATES@	N	N
VBM	PIN	106827121	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	DAVIDSON, KENDALL S	ksd37@yal	N	N
VBM	PIN	115544989	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	DAVIS, AMY L	amydavis7	N	N
VBM	PIN	106740082	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	DEM	DAVIS, BONNIE D		N	N
VBM	PIN	106889908	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	NPA	DAVIS, RICARDO A		N	N
VBM	PIN	106784599	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	DAVIS, WILLIAM M	SHAMBLEE	N	N
VBM	PIN	106846152	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	DAY, JOHN W	JDAY@DAY	N	N
VBM	PIN	107199235	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	DAY, NANCY M	NANCYMD	N	N
VBM	PIN	107001909	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	DE LEON, TAMMY R		N	N
VBM	PIN	121146541	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	DECKER, JANE	JHD7578@	N	N
VBM	PIN	106798783	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	DECKINGA, LINDA R	ODECKINC	N	N
VBM	PIN	107109213	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	DECKINGA, OWEN J	ODECKINC	N	N
VBM	PIN	106991538	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	DEGAN, MARIE L	DEGANPH(	N	N
VBM	PIN	106864775	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	DEGAN, MARK D	DEGANPH(	N	N
VBM	PIN	106838777	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	DEM	DEIBERN, AGUSTIN M	ADEIBERN	N	N
VBM	PIN	106768995	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	DEM	DEIBERN, JOANNE E	JEDEIBERN	N	N
VBM	PIN	107030019	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	DEITCHE, SCOTT M	SDEITCHE(	N	N
VBM	PIN	107110122	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	DELEON, NELSON A		N	N
VBM	PIN	106820339	43887	45524	2024	Prima	8/2/2024	U	6/23/2024	7/16/2024		N	N	N	NPA	DELUCA, JOSEPH P		N	N
VBM	PIN	106721833	43887	45524	2024	Prima	8/2/2024	U	6/23/2024	7/16/2024		N	N	N	NPA	DELUCA, SHARON L	SHARON.D	N	N
VBM	PIN	107284440	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	DEMARTE, LINDA S	LINDADEM	N	N
VBM	PIN	106925068	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	DEMERS-CROWELL, KRISTI	DEMERS.C	N	N
VBM	PIN	120460257	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	DEMUCCI, DONNA F		N	N
VBM	PIN	106945466	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	DENARDI, KATHLEEN		N	N
VBM	PIN	107411537	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	DESHAY, AARON J	MSTORAN(	N	N
VBM	PIN	102627978	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	DESROSIERS, MEGAN E		N	N
VBM	PIN	106991926	43887	45524	2024	Prima	7/23/2024	V	6/23/2024	7/16/2024	7/23/2024	N	N	N	REP	DEVEREUX, AMANDA M	GEMDEVEI	N	N
VBM	PIN	106735999	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	DEVLAMING, DENIS M	ANNE.XMA	N	N
VBM	PIN	106878454	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	DEVLAMING, VONCELE A	DENIS@DE	N	N
VBM	PIN	106920031	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	REP	DEVOL, DANIEL J		N	N
VBM	PIN	110759874	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	NPA	DEVOL, DAVID S		N	N
VBM	PIN	110900700	43887	45524	2024	Prima	8/6/2024	U	6/23/2024	7/16/2024		N	N	N	REP	DEVOL, KRISTINA M		N	N
VBM	PIN	106958517	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	DIEBOLD, BART P	dieboldbar	N	N
VBM	PIN	107072728	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	DIEBOLD, JENNIFER	jennd1875	N	N
VBM	PIN	106851347	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	DIEBOLD, PATRICIA A	PATD9900	N	N
VBM	PIN	106928032	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	DIEBOLD, THOMAS J	TOMDIE44	N	N
VBM	PIN	106828535	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	DILLINGER, KAY P	BDILLIN1@	N	N
VBM	PIN	107192487	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	DINATALE, ANNE M	ANNE.XMA	N	N
VBM	PIN	106827017	43887	45524	2024	Prima	7/30/2024	V	6/23/2024	7/16/2024	7/30/2024	N	N	N	DEM	DIRKSMEYER, CAROLE A		N	N
VBM	PIN	111195618	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	DITTMER, CHRISTIE M	CHRISTIE.I	N	N
VBM	PIN	107042533	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	DOBKIN, RUTH R	RRDGATOI	N	N
VBM	PIN	107349722	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	DOBSON JR, JON B	jbdobsonjr	N	N
VBM	PIN	107328066	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	DOBSON, IZABELA A	izabeladob	N	N
VBM	PIN	106967143	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	DODSON, LINDA A		N	N
VBM	PIN	107074118	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	DOMENICO, THERESA A	TDOMENIC	N	N
VBM	PIN	116858317	43887	45524	2024	Prima	8/13/2024	U	6/23/2024	7/16/2024		N	N	N	NPA	DORENKAMP, TODD A	Todddoren	N	N
VBM	PIN	107307673	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	Y	N	N	REP	DOWLING, MICHAEL G		N	N

VBM	PIN	112577965	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	DRAKE, CYNTHIA A		N	N
VBM	PIN	112578372	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	DRAKE, GLEN L	FISHSTALK	N	N
VBM	PIN	121183134	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	REP	DRAPIEWSKI, JOHN P	drappy@at	N	N
VBM	PIN	121183180	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	REP	DRAPIEWSKI, SANDRA M	Drappy@at	N	N
VBM	PIN	107338757	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	NPA	DREANO, MARY E	BDREANO(	N	N
VBM	PIN	106932265	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	DREW, LAUREL B		N	N
VBM	PIN	106932246	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	DREW, ROBERT S		N	N
VBM	PIN	106771708	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	DEM	DREYFUS, ANDRA T		N	N
VBM	PIN	107692805	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	DRISCOLL, ANNELISE Y	DRANNELI	N	N
VBM	PIN	106825933	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	DRUCKER, JEFFREY A	jadrucker1	N	N
VBM	PIN	114012168	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	IND	DRUM-SOLORZANO, LEANI	LEANDREA	N	N
VBM	PIN	121388205	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	DUBINA, KATHERINE V	KATHERINI	N	N
VBM	PIN	105396803	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/5/2024		N	Y	N	DEM	DUCHAC, DAWN M	email@dav	N	N
VBM	PIN	106894672	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	DUDLEY, DWIGHT R	DWIGHTRI	N	N
VBM	PIN	106988881	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	DUNLEAVY JR, RICHARD M		N	N
VBM	PIN	113952037	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	DEM	DURAN, DAVID A		N	N
VBM	PIN	107320663	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	DURRETT SR, JAMES M	JIMMY52@	N	N
VBM	PIN	106937211	43887	45524	2024	Prima	7/29/2024	U	6/23/2024	7/16/2024		N	N	N	REP	EBERIUS, DENISE F	DFE1@TAI	N	N
VBM	PIN	107436977	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	DEM	EDMOND, CAPRICE J	Caprice33	N	N
VBM	PIN	114969159	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	REP	EDMONS, JOHN S	JEDMONS(	N	N
VBM	PIN	107180337	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	REP	EDMONS, VALERIE L	VEDMONS	N	N
VBM	PIN	106740328	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	EDWARDS, CYNTHIA C	CYNDEE41	N	N
VBM	PIN	107074181	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	EDWARDS, KRISITA D	SISEDWAR	N	N
VBM	PIN	106729897	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	EDWARDS, THOMAS G	tedwards4	N	N
VBM	PIN	120483843	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	ELEM, PETER R		N	N
VBM	PIN	107204997	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	DEM	ELKS, JENNIFER E	ARMISTEAI	N	N
VBM	PIN	115108431	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/5/2024	8/2/2024	Y	N	N	NPA	ELLENZ, AMY D	AMY.ELLEI	N	N
VBM	PIN	120931498	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/5/2024	8/2/2024	Y	N	N	NPA	ELLENZ, ERIC M	ERICERIC_	N	N
VBM	PIN	106745127	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	DEM	ELLIOTT JR, RICHARD	RICKE995(	N	N
VBM	PIN	106898746	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	ELY, PRISCILLA E	RELYON.R	N	N
VBM	PIN	106899185	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	ELY, RICHARD D	RELY.OHR	N	N
VBM	PIN	128322963	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	EMBREY, MARK		N	N
VBM	PIN	106948366	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	ENNIS, CYNTHIA D	CENNIS1@	N	N
VBM	PIN	107009875	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	NPA	ESPARZA, MARK S		N	N
VBM	PIN	106823425	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	ESPINOSA, NILDA		N	N
VBM	PIN	107335705	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	ESTOCH, JEFFREY M	estochj@g	N	N
VBM	PIN	106809450	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	EVANS, DONNA	DONTY914	N	N
VBM	PIN	106940533	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	EVANS, IMELDA C	ICEVANS@	N	N
VBM	PIN	106696153	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	EVANS, THOMAS A	TEVANS53	N	N
VBM	PIN	120462731	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	EVERHART, MICHAEL A		N	N
VBM	PIN	106869790	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	DEM	FAGAN, LORIE S	CHIPSQ9@	N	N
VBM	PIN	107139055	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	FALCONERI, ALEXANDER J		N	N
VBM	PIN	106872590	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	REP	FALLAHEE, DEBORAH L	debby@co	N	N
VBM	PIN	107339088	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	REP	FALLAHEE, TERRANCE C	TFALLAHE(	N	N
VBM	PIN	106871471	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	FALLS, WILLIAM W	FALLSB28(	N	N
VBM	PIN	119337760	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	FALZONE, BRANDI R		N	N
VBM	PIN	106936178	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	NPA	FARRELL, AUSTIN V		N	N
VBM	PIN	107089331	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	NPA	FARRELL, JENNIFER A		N	N
VBM	PIN	106660533	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	REP	FEDERICO, ANGELA D		N	N
VBM	PIN	106857305	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	FEHRMANN, DONNA M	puggle146	N	N
VBM	PIN	106857304	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	FEHRMANN, ERIC P	EDF1460@	N	N
VBM	PIN	107381540	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	FERGUSON, AMY C		N	N
VBM	PIN	106685936	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	FERGUSON, ARCHIE K	MKIRBYF@	N	N
VBM	PIN	106878973	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	FERGUSON, BRADDON R		N	N
VBM	PIN	106379888	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	FERGUSON, KATHLEEN M		N	N
VBM	PIN	114519484	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	FERGUSON, SCOTT A		N	N
VBM	PIN	107125137	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	FESTA, NOELLE E		N	N
VBM	PIN	116827887	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	FICOCELLI, HEATHER K	HKORICA1	N	N
VBM	PIN	106692045	43887	45524	2024	Prima	7/19/2024	V	6/23/2024	7/16/2024	7/19/2024	N	N	N	REP	FISCHER, RODNEY S		N	N
VBM	PIN	102661393	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	FISHER, CLIFFORD F		N	N

VBM	PIN	106897826	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	FISHER, DAVID G		N	N
VBM	PIN	107192822	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	NPA	FISHER, TRACY A	TFIMB@AC	N	N
VBM	PIN	107252541	43887	45524	2024	Prima	8/13/2024	U	6/23/2024	7/16/2024		N	N	N	DEM	FITZGERALD, DAVID J		N	N
VBM	PIN	106894182	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	FLATLEY, JAMES A	JFLATLEY1	N	N
VBM	PIN	106829921	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	FLEMING, JOHN L		N	N
VBM	PIN	106769778	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	REP	FLEMING, MARION L		N	N
VBM	PIN	106827557	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	FLOCK, MARK E		N	N
VBM	PIN	119829005	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/26/2024	8/20/2024	N	N	N	REP	FORMOSA III, EDWARD C		N	N
VBM	PIN	122982657	43887	45524	2024	Prima	7/16/2024	P	6/23/2024	7/17/2024		N	N	N	REP	FORMOSA, PHYLLIS C		N	N
VBM	PIN	107260923	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	NPA	FOSTER, LEROY	LEROYFOS	N	N
VBM	PIN	112292486	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	DEM	FOSTER, MARK D		N	N
VBM	PIN	120101914	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	FOY, JOSEPH J	Nil101@hc	N	N
VBM	PIN	120092009	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	FOY, NILZA	Nil101@hc	N	N
VBM	PIN	106908535	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	FRANKEL, RONALD S	ronfrankel(	N	N
VBM	PIN	106729646	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	FRANZ, DIANA L	DFRANZ9(	N	N
VBM	PIN	106895478	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	FRANZESE, DOUGLAS R	STPETECP/	N	N
VBM	PIN	106937504	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	FRAWLEY, SUSAN D	sdfrawley0	N	N
VBM	PIN	119337759	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	FRIEDMAN, JONATHAN M	FRIEDMAN	N	N
VBM	PIN	106773137	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	FUNK, DOLORES N		N	N
VBM	PIN	106755606	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	FUNK, THOMAS P		N	N
VBM	PIN	118380389	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	FURKA, DEBORAH M	dfurka@tar	N	N
VBM	PIN	107209160	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	FURSE, MATTHEW T	FURSEONE	N	N
VBM	PIN	107032253	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	GADDIS, SARAH E		N	N
VBM	PIN	107287081	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	GALLUCCIO JR, GUY A		N	N
VBM	PIN	107287339	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	GALLUCCIO, CHRISTINE M	GCNGAL@	N	N
VBM	PIN	106996903	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	NPA	GANDY, ERIC S	TWOBADD	N	N
VBM	PIN	106778072	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	DEM	GARAFALO, MICHAEL A	TACMAG5:	N	N
VBM	PIN	106967701	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	DEM	GARAFALO, RAECHEL S	RAESG@M	N	N
VBM	PIN	106895793	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	DEM	GARDNER, MELISSA L	MLG85@M	N	N
VBM	PIN	106732288	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	REP	GARREN, DANIEL L		N	N
VBM	PIN	111629784	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/24/2024	8/1/2024	N	N	N	DEM	GARRISON, MEGAN E		N	N
VBM	PIN	107111772	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GARVEY, DENNIS J	CRISDENN	N	N
VBM	PIN	110818505	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	GARY, ANTONIA C	TONIWONI	N	N
VBM	PIN	106760857	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	GARY, JAMES L	JJGARY@T/	N	N
VBM	PIN	107006574	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	GASKIN-CAPEHART, ANDRI		N	N
VBM	PIN	105084822	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	GASKINS, JAMES S	TROOPER1	N	N
VBM	PIN	106982911	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	NPA	GATLIN, ALISA A		N	N
VBM	PIN	106981382	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	NPA	GATLIN, DAVID W		N	N
VBM	PIN	100506894	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	GAVIN, ROBERT J		N	N
VBM	PIN	106735567	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GAVIN, THOMAS A	TAGAVIN9(	N	N
VBM	PIN	107110205	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	DEM	GENTRY, BROOKS N		N	N
VBM	PIN	107013029	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	GEORGATOS, CHRIS J		N	N
VBM	PIN	106866234	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	GERAKIOS, CHRISANN K		N	N
VBM	PIN	106443491	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	GERAKIOS, NICKOLAS G	N1ROCK@	N	N
VBM	PIN	107052306	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	GERARDO, DAVID J	davidjgera	N	N
VBM	PIN	107431992	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	NPA	GERCZAK, CRISTIN B	CRISTIN.G	N	N
VBM	PIN	115794716	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	GERCZAK, WESLEY H	WGERCZA	N	N
VBM	PIN	127663515	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	GIANOLA, JOHN M		N	N
VBM	PIN	106841566	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	GIBSON, GUY C	DRGIBBY6	N	N
VBM	PIN	110785320	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	GIBSON, KATHLEEN E	kathiegibs	N	N
VBM	PIN	115479938	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	GIBSON, MICHELE L	MGIBSONE	N	N
VBM	PIN	107863001	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GIDUS, JAN A	ANDYGIDU	N	N
VBM	PIN	107863000	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	GIDUS, JUDITH A	JAG52011(	N	N
VBM	PIN	118610036	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	REP	GILBERT, DENNIS R	GILBY4SO(	N	N
VBM	PIN	119305286	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GILBERT, MARSHA M	MARSHAG	N	N
VBM	PIN	111808874	43887	45524	2024	Prima	7/30/2024	V	6/23/2024	7/16/2024	7/30/2024	N	N	N	REP	GILLETTE, MARC B	marc.gillet	N	N
VBM	PIN	106692539	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GLEASON JR, HOWARD B		N	N
VBM	PIN	106692540	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GLEASON, VIVIAN M		N	N
VBM	PIN	106877395	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	REP	GOING, CANDACE A	THEGOING	N	N
VBM	PIN	106877393	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	REP	GOING, ROBERT T	THEGOING	N	N

VBM	PIN	107101508	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GOLCZEWSKI, CHRISTINE I	CHRISTINE	N	N
VBM	PIN	107005748	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GOLCZEWSKI, SCOTT T	SCOTTGOL	N	N
VBM	PIN	122229092	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	GOLDOVICH, ALEXANDER I		N	N
VBM	PIN	107278387	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	GOMEZ, KATHERINE C		N	N
VBM	PIN	107204033	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	GONZALES, HENRY		N	N
VBM	PIN	107136426	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	NPA	GONZALEZ, REBECCA A	LILBRL974	N	N
VBM	PIN	106857754	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	GOODLEY, JONI L	JHOLSTEIN	N	N
VBM	PIN	122600816	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	GOODWILL, MOLLY E	MOLLY.ELI	N	N
VBM	PIN	111318247	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	GOODWIN, APRIL S	goodwinap	N	N
VBM	PIN	106901988	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	GORHAM, JAMES W	LTBILLG@(	N	N
VBM	PIN	106914935	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GORHAM, TRICIA G		N	N
VBM	PIN	106993774	43887	45524	2024	Prima	8/6/2024	U	6/23/2024	7/16/2024		N	N	N	DEM	GORMAN, JUDITH A		N	N
VBM	PIN	107140374	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	GORMAN, KEVIN P		N	N
VBM	PIN	114757636	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	DEM	GOSNELL, JEFFREY K	gosnellt8@	N	N
VBM	PIN	106853060	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GOUGH, ELLEN D	ELLENGOL	N	N
VBM	PIN	107154092	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	GOUGH, JOHN R	jrgough2@	N	N
VBM	PIN	125539289	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	GOULD, CLIFFORD B		N	N
VBM	PIN	125846971	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GOULD, HARRY N		N	N
VBM	PIN	114819964	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	GOVONI, BRITTANY P	brittanypg(	N	N
VBM	PIN	107153045	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	GRACE-WALKER, CAROL A		N	N
VBM	PIN	117893237	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	NPA	GRAHAM CRAWFORD, BRA		N	N
VBM	PIN	106717642	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	GRAHAM, CYNTHIA		N	N
VBM	PIN	116896838	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	GRAHAM, JEVON A		N	N
VBM	PIN	107039872	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	GRANT, RHETT		N	N
VBM	PIN	106797582	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	GRANT, RICHARD F	RICHRHET	N	N
VBM	PIN	107067774	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	NPA	GRANVILLE, ALBERT L		N	N
VBM	PIN	110749158	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GRAWUNDER, DAVID P		N	N
VBM	PIN	110736007	43887	45524	2024	Prima	7/19/2024	P	6/23/2024	7/22/2024		N	N	N	REP	GRAWUNDER, JENNIFER S	FIVEWUNI	N	N
VBM	PIN	107233344	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	GRAY, CAROL D		N	N
VBM	PIN	107239456	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	NPA	GRECO, ERNEST B		N	N
VBM	PIN	118129198	43887	45524	2024	Prima	7/16/2024	V	6/23/2024	7/5/2024	7/16/2024	Y	N	N	DEM	GREENWOOD, JEREMY M	jermgreen1	N	N
VBM	PIN	106798655	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	DEM	GREER, GAIL-PATRICIA	GPGREER(	N	N
VBM	PIN	110621159	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	NPA	GREINER, TERESA D		N	N
VBM	PIN	106794561	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	REP	GREUL, KAREN S		N	N
VBM	PIN	106867182	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	GRIFFIS JR, RONNIE K	rkkl@msn.	N	N
VBM	PIN	106831544	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	GRIFFIS, KRISTEN L	rkkl@msn.	N	N
VBM	PIN	116069827	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	GRIFFITHS, MICHAEL T	MGRIFF82(	N	N
VBM	PIN	107190275	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	GRIFFITHS, NICOLE M	theofficear	N	N
VBM	PIN	106971819	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GRIGGS, JEAN M	JEANMARII	N	N
VBM	PIN	117216165	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	NPA	GRIMES, WENDY L	wgrimes@'	N	N
VBM	PIN	106912821	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	GRISSINGER, KEVIN M		N	N
VBM	PIN	106895216	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	GROFF, CHRISTOPHER S		N	N
VBM	PIN	107293507	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	GROFF, JANET S	JANET516(	N	N
VBM	PIN	106796296	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	GROVER, ADRIENNE J	AGROVER(	N	N
VBM	PIN	106800770	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	GROVER, DAVID M	AGROVER(	N	N
VBM	PIN	106767770	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	GRUBE, KARL B		N	N
VBM	PIN	126074685	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	GRUESCHOW, BENJAMIN J	bgruescho	N	N
VBM	PIN	120491285	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/16/2024		Y	N	Y	DEM	GUARINO, NICOLE B	nmbusque	N	N
VBM	PIN	107047634	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	GUGLIOTTA, ANTOINETTE L		N	N
VBM	PIN	102005468	43887	45524	2024	Prima	8/13/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	GUILFOYLE, JACLYNN J	JACLYNN.(	N	N
VBM	PIN	107062197	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GUNNELS, GARY L	GGUNNEL:	N	N
VBM	PIN	107062180	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	GUNNELS, ROSEMARY J	ROSEMAR'	N	N
VBM	PIN	106688686	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	GUNTHER, CLAUDIA B		N	N
VBM	PIN	106882674	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	REP	GUSTAVSON, MARGO K		N	N
VBM	PIN	107144624	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	NPA	HADDAD, PATRICIA S	haddad.pa	N	N
VBM	PIN	107130863	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	NPA	HADDAD, RONALD J	rjhaddad@	N	N
VBM	PIN	114157789	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	HAHN, GABRIEL D	GABRIEL.H	N	N
VBM	PIN	106688590	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	HALE, BETTY S		N	N
VBM	PIN	106844582	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	HALL, DONALD J	H1830OAK	N	N
VBM	PIN	118173058	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	HALL, NICOLE A		N	N

VBM	PIN	106772334	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	HALL, PATRICE R		N	N
VBM	PIN	100175679	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	HALLER, RICHARD L	PORKY505	N	N
VBM	PIN	106764697	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	HALLIDAY, JOHN M	BEAST200	N	N
VBM	PIN	106764443	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	HALLIDAY, KATHLEEN M	KATHY.NO	N	N
VBM	PIN	110915731	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	DEM	HANEWICZ, LISSET G	GONZALEZ	N	N
VBM	PIN	100516601	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	DEM	HANEWICZ, WAYNE O		N	N
VBM	PIN	107402355	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	HANSEN, CORY B	RHANSEN2	N	N
VBM	PIN	106869187	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	HANSEN, DAVID H		N	N
VBM	PIN	106833501	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	NPA	HANSEN, LISA Y	RHANSEN2	N	N
VBM	PIN	106852046	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	NPA	HANSEN, RAYMOND G	RHANSEN2	N	N
VBM	PIN	111091484	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	HARDWAY, CHRISTINE M	christine@	N	N
VBM	PIN	107426189	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	HAREWOOD, STEPHANI R	SHAREWO	N	N
VBM	PIN	106736910	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	8/9/2024	8/17/2024	N	N	N	REP	HARLAN, CATHERINE M	CHARLANS	N	N
VBM	PIN	107100981	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	8/9/2024	8/17/2024	N	N	N	NPA	HARLAN, JOHN J		N	N
VBM	PIN	106757431	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	NPA	HARMON, JOHN R	JR282@MS	N	N
VBM	PIN	123243002	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	REP	HARPER, MACY M	macymhar	N	N
VBM	PIN	108356952	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	HARPER, TROY M	HARPERT4	N	N
VBM	PIN	107335581	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	HARR, DOUGLAS B	DOUG@HA	N	N
VBM	PIN	107150599	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	HARR, KIMBERLY B	HARRINSU	N	N
VBM	PIN	100883248	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	HARRIGAN, MICHAEL D	HARRIGAN	N	N
VBM	PIN	107106269	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	DEM	HARRINGTON, LEE J	HARRINGT	N	N
VBM	PIN	107322579	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	HARRIS JR, ALBERT R		N	N
VBM	PIN	115530725	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	HARRIS, DANIEL M	CGBMCS@	N	N
VBM	PIN	128288836	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	HARRIS, JERRY W		N	N
VBM	PIN	107296394	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	HARRIS, PATRICIA S	PATTYCZ@	N	N
VBM	PIN	106997531	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	HARRIS-BROWN, DENETRI/	GRANDMA	N	N
VBM	PIN	107022866	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	HARRISON, GREGORY P	GREGHARI	N	N
VBM	PIN	118504296	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	HARTLING, RICHARD		N	N
VBM	PIN	106722288	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	HARVEY, DEBORAH L	deborah_c	N	N
VBM	PIN	106756783	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	HARWOOD JR, LEE E		N	N
VBM	PIN	123196039	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	HASHEM, TIFFANY E		N	N
VBM	PIN	107163880	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	HASTINGS, LACIE V	CLEMENTL	N	N
VBM	PIN	127790394	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	HASTY, ADRIA E	AHASTY20	N	N
VBM	PIN	123218742	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	HATFIELD, DAWNMARIE E		N	N
VBM	PIN	123218832	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	HATFIELD, MIKE		N	N
VBM	PIN	124325392	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	REP	HAUN, FLORENCE B		N	N
VBM	PIN	121867452	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/5/2024		Y	N	N	REP	HAUPT, KELLY L	kellylhpt@	N	N
VBM	PIN	106830897	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	DEM	HAWKINS, GORDON A	GORDYHA	N	N
VBM	PIN	107375071	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	NPA	HAWKINS, RUSSELL C		N	N
VBM	PIN	106744566	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	HEINICKA, KIM R	KHEINICK/	N	N
VBM	PIN	114340336	43887	45524	2024	Prima	7/18/2024	P	6/23/2024	7/19/2024		N	N	N	REP	HELINGER, ROBERT J	robhelinge	N	N
VBM	PIN	106893501	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	NPA	HENDEE, RHONDA S	SHADOWE	N	N
VBM	PIN	105007945	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	DEM	HENDRY, DAVID F	david.henc	N	N
VBM	PIN	100788366	43887	45524	2024	Prima	7/22/2024	P	6/23/2024	7/23/2024		Y	N	N	DEM	HERMANN, DIRK T	HERMANN	N	N
VBM	PIN	101056188	43887	45524	2024	Prima	7/17/2024	P	6/23/2024	7/18/2024		Y	N	Y	NPA	HERMANN, STACY L	STACYHER	N	N
VBM	PIN	106854370	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	DEM	HESSLING, PETER A		N	N
VBM	PIN	106776323	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	HETRICK, BENJAMIN H	BOKAYTI@	N	N
VBM	PIN	123848870	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	HEWITT, DENNY S		N	N
VBM	PIN	124987431	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	HILKERT, ALEXANDER L		N	N
VBM	PIN	106913954	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	HILKERT, DOUGLAS L	DLH@HILK	N	N
VBM	PIN	126984143	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	HILKERT, DOUGLAS L	luke@hilke	N	N
VBM	PIN	106879385	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	HILKERT, TANYA S	TANYA@HI	N	N
VBM	PIN	107322971	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	NPA	HILL, DEAN N		N	N
VBM	PIN	111274989	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	DEM	HILL, DENISE M	desigrl17@	N	N
VBM	PIN	106694161	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	HILL, JAMES C	HILLJ@SPC	N	N
VBM	PIN	106808845	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	NPA	HILL, KAREN D	KIKIDK@TA	N	N
VBM	PIN	106694162	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	HILL, MIRIAM S		N	N
VBM	PIN	106745557	43887	45524	2024	Prima	7/23/2024	U	6/23/2024	7/17/2024		N	N	N	REP	HILLIARD JR, SIDNEY M		N	N
VBM	PIN	106805596	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/17/2024	8/5/2024	N	N	N	REP	HILLIARD, LINDA K	LKHILLIARI	N	N
VBM	PIN	107393087	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	DEM	HINSON, LORRAINE A	1HINSON1	N	N

VBM	PIN	106898223	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	HODRICK, JAMES T			N	N
VBM	PIN	106715085	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	HODRICK, LISA A			N	N
VBM	PIN	106773206	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	HOFFMAN, DENNIS L	eswdlh@ta		N	N
VBM	PIN	107134710	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	HOFFMAN, ELLEN S	eswdlh@ta		N	N
VBM	PIN	106897496	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	HOGAN, MARILYN E			N	N
VBM	PIN	106911196	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	HOLCOMB, DAWN M	DAWNMH1		N	N
VBM	PIN	113994047	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	HOLDEN, JAMES P	JHOLDEN@		N	N
VBM	PIN	106898050	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	REP	HOLLAND, EDWARD K	PCSODEPU		N	N
VBM	PIN	105341800	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	NPA	HOLMES, CORIE M	HOLMESCI		N	N
VBM	PIN	125972519	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	IND	HOMAN, AMY L			N	N
VBM	PIN	115222430	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	DEM	HORN, PAMELA S	ROSIE381		N	N
VBM	PIN	115710678	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	HORNE JR, ROBERT G	ROBCONN		N	N
VBM	PIN	106810484	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	NPA	HORROX, DONALD E			N	N
VBM	PIN	107011939	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	REP	HOSKEY, DEBRA S			N	N
VBM	PIN	106849201	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	Y	N	N	REP	HOSKEY, JOHN P	JHOSKEY@		N	N
VBM	PIN	106846000	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	HOUNCHELL, CAROL O	CAROLOH		N	N
VBM	PIN	106858382	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	HOUNCHELL, STEVEN P	BULL1909		N	N
VBM	PIN	113094952	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	HOUSMAN, HARON S	HARON.HO		N	N
VBM	PIN	113837427	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	HOUSTON, DAVID H			N	N
VBM	PIN	103535517	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	HOUTLER, BRUCE D			N	N
VBM	PIN	106849711	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	HOY, WENDY C	carojoncre		N	N
VBM	PIN	106926939	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	HUBBARD, PATRICE N	PATRICEBI		N	N
VBM	PIN	106914525	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	REP	HUBBLE, CANDICE M	CMHUBBL		N	N
VBM	PIN	107037866	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	HUBBLE, KAREN P	KHUBBLE2		N	N
VBM	PIN	106879099	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	HUBBLE, MICHAEL S			N	N
VBM	PIN	113555188	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	HUBER, MATTHEW E	mhuber@r		N	N
VBM	PIN	106852893	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	HUDSON, ANN R			N	N
VBM	PIN	106840544	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	HUDSON, DONALD G			N	N
VBM	PIN	116087841	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	HUDSON, ROBERT C			N	N
VBM	PIN	106839372	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	HUGHES, MICHAEL E			N	N
VBM	PIN	106962782	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	HUGHES, STACEY R			N	N
VBM	PIN	106831543	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	REP	HUMISTON, MARC A	MHUMMEF		N	N
VBM	PIN	107255152	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	HUNTINGTON SYMONS, MA	m.huntingt		N	N
VBM	PIN	114212926	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	IHLER, CATHLEEN A			N	N
VBM	PIN	116875474	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	IHLER, CURTIS N			N	N
VBM	PIN	107149376	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	IM, HYOUN K	KAY@SON		N	N
VBM	PIN	106971507	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	IM, SEUNG W	SONNY@S		N	N
VBM	PIN	107179997	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	INGRASSIA, FRANK P	01W1R1@		N	N
VBM	PIN	107173752	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	INGRASSIA, RENEE R			N	N
VBM	PIN	106838809	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	INHULSEN, TERRY J			N	N
VBM	PIN	128415937	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	IND	INKS, JESSICA J	MarantaRa		N	N
VBM	PIN	106947759	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	INTZES, KALLIOPI S	FIREGAL4(		N	N
VBM	PIN	110448297	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	ISAACSON, JILL			N	N
VBM	PIN	106900253	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	JACKSON, PAUL A	trustpj@gn		N	N
VBM	PIN	106792235	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	JACOBS, BARBARA A			N	N
VBM	PIN	107232900	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	JACWIN, THOMAS D			N	N
VBM	PIN	130471287	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	JAGGER, BLAKE B	BJAGGER@		N	N
VBM	PIN	106832762	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	JAGGER, EDWIN B	EJAGGER@		N	N
VBM	PIN	106935052	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	JAGGER, MELISSA B	MJAGGER@		N	N
VBM	PIN	106872178	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	NPA	JAROSZ, JUDITH A	PARKGODI		N	N
VBM	PIN	107192089	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	JARVIS, JOANNE K	JOANNEYB		N	N
VBM	PIN	107100078	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	JARVIS, WILLIAM A	FILODLUEI		N	N
VBM	PIN	116738004	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	8/10/2024	8/19/2024	N	N	N	REP	JAWOROWSKI, GEORGINE			N	N
VBM	PIN	116737983	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	8/6/2024	8/15/2024	N	N	N	REP	JAWOROWSKI, STANLEY A			N	N
VBM	PIN	106923449	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	JENSEN, THOMAS H	TJENSENPI		N	N
VBM	PIN	106885575	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	JEROME, TAMMY D			N	N
VBM	PIN	120457874	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	JOHANSEN, SHERYL CA	Johansen.s		N	N
VBM	PIN	131222444	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	JOHN-BAPTISTE, ROSIE	Rosie@joh		N	N
VBM	PIN	110758203	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	JOHNSON, ANTHONY R			N	N
VBM	PIN	106986431	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	JOHNSON, DOREEN G			N	N

VBM	PIN	107026170	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	JOHNSON, SHARON	thej0hns0r	N	N
VBM	PIN	107256970	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	JONES JR, MILES A	MJONES1@	N	N
VBM	PIN	106837787	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	JONES JR, ROBERT E		N	N
VBM	PIN	120151083	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	JONES, BRYON K	bkj_85@ya	N	N
VBM	PIN	106822141	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	JONES, CHARLOTTE F	MJONES1@	N	N
VBM	PIN	106792900	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	JONES, DALE R		N	N
VBM	PIN	107021858	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	JONES, DERWOOD B	DOGCATC	N	N
VBM	PIN	107384136	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	JONES, JENNIFER DC	jendcruz41	N	N
VBM	PIN	107174189	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	JOSWIG, HEIDI L	heidi@3do	N	N
VBM	PIN	111073823	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	JOYCE, GRAY S	GRAYBARE	N	N
VBM	PIN	107127597	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	REP	JOZWIAK III, EDWARD J		N	N
VBM	PIN	107149580	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	REP	JOZWIAK, DEBRA A		N	N
VBM	PIN	115639007	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	JOZWIAK, ERICA L		N	N
VBM	PIN	119376066	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	REP	JOZWIAK, GINA M		N	N
VBM	PIN	106872364	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	IND	JUDD, KEVIN J		N	N
VBM	PIN	125777461	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	JUPITER, JASON M	Jason.m.ju	N	N
VBM	PIN	128313867	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	Y	N	Y	REP	KAKAREKA, ASHLEY T	ashleytdru	N	N
VBM	PIN	117769613	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	Y	N	N	REP	KAKAREKA, JACOB P	Jacob.kaka	N	N
VBM	PIN	119926630	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	KALAMAS, PAUL S	pskalamas	N	N
VBM	PIN	109788632	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	KAMENESH, PETER Z		N	N
VBM	PIN	107334718	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	KAPOUS, SYLVIA K	SYKAP727(	N	N
VBM	PIN	106688604	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	KAROL, RICHARD T	RTKBCK@\	N	N
VBM	PIN	107361593	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	KEELER, SILAS R	SILAS_KEE	N	N
VBM	PIN	106916912	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	KEHOE, JOSEPH M		N	N
VBM	PIN	107072111	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	KELESYAN, KATHLEEN R	KKELESYAI	N	N
VBM	PIN	106865324	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	KELESYAN, VAN A		N	N
VBM	PIN	123021483	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	KELLER, MIRIAM J		N	N
VBM	PIN	106767425	43887	45524	2024	Prima	7/30/2024	V	6/23/2024	7/16/2024	7/30/2024	N	N	N	DEM	KELLER, SUSAN		N	N
VBM	PIN	114260140	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	KELLY, DENNIS C	IRISHCOP:	N	N
VBM	PIN	111177863	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	KELZER JR, MICHAEL R	KELZAMED	N	N
VBM	PIN	126919040	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	KELZER, CHRISTOPHER M		N	N
VBM	PIN	110990796	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	KELZER, REBECCA E	BECKYFRC	N	N
VBM	PIN	114446954	43887	45524	2024	Prima	7/18/2024	V	6/23/2024	7/5/2024	7/18/2024	Y	N	N	NPA	KEMP, MICHAEL C	MCKEMP@	N	N
VBM	PIN	106778332	43887	45524	2024	Prima	8/2/2024	U	6/23/2024	7/16/2024		N	N	N	REP	KEMP, SALLY L		N	N
VBM	PIN	106845930	43887	45524	2024	Prima	8/13/2024	U	6/23/2024	7/16/2024		N	N	N	DEM	KERN, PAMELA L		N	N
VBM	PIN	107015570	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	REP	KERR, CHRISTOPHIR A	CHRISTOP	N	N
VBM	PIN	107018966	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	REP	KERR, LISA M	KERR3156(	N	N
VBM	PIN	106797155	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	KINDRED, MELANIE J		N	N
VBM	PIN	119784920	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	DEM	KINGSBURY, CHELSEA L	chelseakin	N	N
VBM	PIN	106958055	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	KINGSTON, CAROL L		N	N
VBM	PIN	106991793	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	KLIMIADES, ALEXANDRA J		N	N
VBM	PIN	107331347	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	KLOEPFER, MICHAEL A		N	N
VBM	PIN	107367843	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	KLOEPFER, RACHEL E		N	N
VBM	PIN	106890421	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	KNIGHT JR, JAMES E	JNIGHT333	N	N
VBM	PIN	106927248	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	KNIGHT, SUSAN E		N	N
VBM	PIN	107074417	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	KNOX, JANE M	JANIEBABY	N	N
VBM	PIN	120581415	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	KOCH, CHARLES L	CKOCH@H	N	N
VBM	PIN	123204004	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	REP	KOLOTA, BRIAN V	BRIAN.KOL	N	N
VBM	PIN	107141860	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	KOLOTA, LEAH B	lbkolota@g	N	N
VBM	PIN	120735321	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	KOLOTA, TYLER A	takolota@u	N	N
VBM	PIN	115470310	43887	45524	2024	Prima	7/15/2024	V	6/23/2024	7/5/2024	7/15/2024	Y	N	N	DEM	KOLWICZ, ERIC R	EKOLWICZ	N	N
VBM	PIN	102202565	43887	45524	2024	Prima	7/19/2024	V	6/23/2024	7/5/2024	7/19/2024	Y	N	Y	DEM	KOLWICZ, GLORIA R	GLORIARO	N	N
VBM	PIN	107203473	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	REP	KOSKINAS, THOMAS D	TOMKOSIN	N	N
VBM	PIN	107202356	43887	45524	2024	Prima	8/2/2024	U	6/23/2024	7/22/2024		N	N	N	NPA	KUNISH, CINDY	CINDYKUN	N	N
VBM	PIN	107093022	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	LACHANCE, DEAN A	DALACHAI	N	N
VBM	PIN	106731031	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	LACHANCE, DEAN E	DEANLACH	N	N
VBM	PIN	106747573	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	LAMBERT, BELINDA B	BOCKLAMI	N	N
VBM	PIN	122347707	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	NPA	LANATA, CONSTANZA R	constanzal	N	N
VBM	PIN	106889262	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	LANCHEROS, IRMA L	llan27@ho	N	N
VBM	PIN	111103627	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	LANE, JOHN K	BIGRIGWIL	N	N

VBM	PIN	107024132	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	LANE, PATRICE N	NOLAN.La	N	N
VBM	PIN	118168593	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	LANG, DEREK R		N	N
VBM	PIN	129921237	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	LARSON, JARED R	espnnut07	N	N
VBM	PIN	107000371	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	LATTO, CELESTE L	CLATTO@(	N	N
VBM	PIN	106917040	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	DEM	LAUGHLIN, CHRISTOPHER		N	N
VBM	PIN	106891296	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	LAUGHLIN, KIMBERLY A	GATOR_DF	N	N
VBM	PIN	106740219	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	DEM	LAUGHLIN, LAUREN C	laurenlaug	N	N
VBM	PIN	106947160	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	NPA	LAWSON, BARBARA ANN P		N	N
VBM	PIN	106719534	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	LEASURE, PAMELA S	61PLEASU	N	N
VBM	PIN	106847989	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	LEBRENZ, EUGENE R		N	N
VBM	PIN	106930605	43887	45524	2024	Prima	7/23/2024	V	6/23/2024	7/16/2024	7/23/2024	N	N	N	REP	LEE, BOBBIE S		N	N
VBM	PIN	119847937	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	LEHMANN, HALEY S	HALEYSLE	N	N
VBM	PIN	106870885	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	LEHMANN, JOSEPH R	JLEHMANN	N	N
VBM	PIN	106870884	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	LEHMANN, LISA M	LEHMANN	N	N
VBM	PIN	106821593	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	DEM	LENAS, CAROL A	CAROL740	N	N
VBM	PIN	106713179	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	LENDERMAN, ANDERA M	memeonar	N	N
VBM	PIN	113898958	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/16/2024		Y	N	N	REP	LEVECQUE, MICHAEL C	MIKE.LEVE	N	N
VBM	PIN	126031855	43887	45524	2024	Prima	7/23/2024	V	6/23/2024	7/16/2024	7/23/2024	N	N	N	REP	LEWIS, MICHAEL J		N	N
VBM	PIN	106705977	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	LEWIS, WILLIAM A		N	N
VBM	PIN	106758682	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	DEM	LEY, PAUL D	PDOUGLAS	N	N
VBM	PIN	116583392	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	LEYVA, FRANK	LEYVA.FRA	N	N
VBM	PIN	123026984	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	LEYVA, KAROLINE L	Leyva.karo	N	N
VBM	PIN	106712387	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	LIBBY, DAVID	DLIBBY@G	N	N
VBM	PIN	107173294	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	LINDSAY, JENNIFER L	jleitner3@g	N	N
VBM	PIN	117976896	43887	45524	2024	Prima	7/29/2024	U	6/23/2024	7/16/2024		N	N	N	REP	LIPPOLD, MICHAEL J	LIPPOLDM	N	N
VBM	PIN	107377967	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	LIPTON, ALEXIS L	alexisliptor	N	N
VBM	PIN	112786034	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	LIPTON, ERIC J	liptonlaw@	N	N
VBM	PIN	117280509	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	NPA	LITTLE, AMANDA V	amanda.ve	N	N
VBM	PIN	107177526	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	LIU, GAIL T		N	N
VBM	PIN	107177525	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	LIU, JOHN J		N	N
VBM	PIN	122957138	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	LIU, JOHN T		N	N
VBM	PIN	130959730	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	LIU, NOLEN O		N	N
VBM	PIN	119943986	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	LOAR, WILLIS C	CHAD_LOA	N	N
VBM	PIN	107104287	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	LOBIANCO, DEAN W	loborealtyi	N	N
VBM	PIN	106894501	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	LOCKHEART, SHANNON K	shannonrk	N	N
VBM	PIN	107049483	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	LOFTON, GEORGE D	Gdlofton@	N	N
VBM	PIN	107447525	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	LOFTUS, AIMEE R		N	N
VBM	PIN	107055053	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	LOFTUS, JASON G		N	N
VBM	PIN	106745979	43887	45524	2024	Prima	7/30/2024	V	6/23/2024	7/16/2024	7/30/2024	N	N	N	NPA	LOGAN, WALTER D		N	N
VBM	PIN	116421256	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	LOIBL, TRACY M	Tracyloibl@	N	N
VBM	PIN	107077597	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	LONG, BETTY J	GARIF3@G	N	N
VBM	PIN	107057201	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	LONG, CATHERINE B	CATHI1@L	N	N
VBM	PIN	124669593	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	LONG, PEGGY H	PMHEIM@A	N	N
VBM	PIN	107305773	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	REP	LONG, ROBERT A	RALONG03	N	N
VBM	PIN	107102851	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	LONG, STANLEY E	longfish5@	N	N
VBM	PIN	107166056	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	LOPES, FILOMENA		N	N
VBM	PIN	106832460	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	LOPES, JONATHAN D	LT90937@	N	N
VBM	PIN	124965440	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	LOTFI, CHERI L		N	N
VBM	PIN	107216778	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	LOVE WILSON, TANYA M	TLOVE102	N	N
VBM	PIN	106706293	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	LOWERY, MARILYN I		N	N
VBM	PIN	107072527	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	REP	LUKAS, ANGELA G	AGLTCHR@	N	N
VBM	PIN	107072525	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	REP	LUKAS, STANLEY A	AGLTCHR@	N	N
VBM	PIN	106913242	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	LUMBARD, MELISSA K		N	N
VBM	PIN	121595171	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	LUND JR, JOHN C	jclbiz@hot	N	N
VBM	PIN	121595124	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	DEM	LUND, LYN C	lynclund@	N	N
VBM	PIN	104421329	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	LUNDH, JAMES R		N	N
VBM	PIN	104419552	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	LUNDH, LORIANN M		N	N
VBM	PIN	106947445	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	REP	LUNSFORD, MICHAEL B	MBLUNSF(	N	N
VBM	PIN	106782105	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	LUTEN, CLAIRE K		N	N
VBM	PIN	107077794	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	LUTRZYKOWSKI, TAMRA M		N	N

VBM	PIN	107007221	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	LYNN, MICHELLE A			N	N
VBM	PIN	107009065	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	LYONS, STEPHANIE M	SUNSANDI		N	N
VBM	PIN	107164048	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/17/2024	7/24/2024	N	N	N	REP	MAC CALLUM, CAROL A	dsmsmac@		N	N
VBM	PIN	107164046	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/17/2024	7/24/2024	N	N	N	REP	MACCALLUM, DUNCAN S	smac5271		N	N
VBM	PIN	106839907	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	MACCINI, MICHELLE H	MMANCCI		N	N
VBM	PIN	107181745	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MACE, DONALD S	DSMACE7(		N	N
VBM	PIN	114681412	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MACE, EMILIA			N	N
VBM	PIN	106923057	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MACINTYRE, CHARLES R	CAPTCHU(		N	N
VBM	PIN	106806131	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MACIUBA, JOAN L	JABUICAM		N	N
VBM	PIN	106806132	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MACIUBA, RICHARD C	RABUICAM		N	N
VBM	PIN	125907552	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/25/2024	8/9/2024	N	N	N	DEM	MADRIGAL, VIRGIE M			N	N
VBM	PIN	107104358	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MAHER, TIMOTHY P	TIM11779(		N	N
VBM	PIN	115906756	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	MAKRAS, PETER A			N	N
VBM	PIN	107400891	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MAKRAS, TIFFANY C	tmakras@r		N	N
VBM	PIN	106843793	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MALIN, LINDA M	LINDA.LES		N	N
VBM	PIN	111071613	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MANCUSI, DAVID L			N	N
VBM	PIN	107210265	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MANCUSI, NICOLE M			N	N
VBM	PIN	108455879	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	NPA	MANN, CARROLL S			N	N
VBM	PIN	106801870	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	MANNING, MICHAEL T	X7FUZZ@Y		N	N
VBM	PIN	106843187	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	REP	MANSURE JR, RICHARD H	RMANSUR		N	N
VBM	PIN	125853642	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MARAN, SARAJANE C	Scmaran5		N	N
VBM	PIN	106715000	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	DEM	MARCEAU, CECILIA G	CMARCEA		N	N
VBM	PIN	115099935	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MARCET, DANIEL J	DANJMAR2		N	N
VBM	PIN	106996332	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	MARCUS SR, ROBERT A			N	N
VBM	PIN	107035036	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	MARCUS, NANCY A	namarcus(		N	N
VBM	PIN	107401315	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MARKOSE, ALICE	MARKOSEI		N	N
VBM	PIN	106860560	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	MARLAND, MARK D			N	N
VBM	PIN	106925546	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	MARLAND, PAMELA A			N	N
VBM	PIN	106955788	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MAROT, LISA L			N	N
VBM	PIN	122333476	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MAROTTA, JESSE P	JPMAROTT		N	N
VBM	PIN	113011932	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MAROTTA, JOLENE B	JOLENEMA		N	N
VBM	PIN	110792666	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MARQUISE, KALLEEN A	KALLEENM		N	N
VBM	PIN	107188818	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	NPA	MARSHALL, KRISTIN L			N	N
VBM	PIN	106948285	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	MARSHALL, LISA P	BUDHORS		N	N
VBM	PIN	107428324	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	MARSTELLER, ELIZABETH A	LIZMOR72(		N	N
VBM	PIN	107164380	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	MARSTELLER, ERIK C	FALCONM/		N	N
VBM	PIN	106775315	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MARTIN JR, GLENN L	FLAPROSE		N	N
VBM	PIN	113488990	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MARTIN JR, JOHN P	GETNCLOS		N	N
VBM	PIN	107073826	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MARTIN, DARRY D	DARKHAMI		N	N
VBM	PIN	106881263	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	MARTIN, GRAHAM			N	N
VBM	PIN	106784586	43887	45524	2024	Prima	7/23/2024	V	6/23/2024	7/16/2024	7/23/2024	N	N	N	NPA	MARTIN, MARY JO	MARYJO.M		N	N
VBM	PIN	126247038	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MARTIN, TENNIE B			N	N
VBM	PIN	106787574	43887	45524	2024	Prima	8/6/2024	U	6/23/2024	7/16/2024		N	N	N	REP	MARTINDILL, ROGER W	AIRSLEUTH		N	N
VBM	PIN	107442014	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MARTINSON, ASHLEY L	ASHER758		N	N
VBM	PIN	122738832	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	NPA	MARZULLO, DAVID M	MARZULLC		N	N
VBM	PIN	106835893	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	MASSARO, ANTHONY T	antmas42(		N	N
VBM	PIN	106951287	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	CPF	MATHIS, SYLVESTER A			N	N
VBM	PIN	106893091	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	MATTHEWS-RILEY, CHELSE	CRILEY65(		N	N
VBM	PIN	106837689	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MAXLOW, ROBERT J	DBMAXLO\		N	N
VBM	PIN	107393731	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MAYER, PAUL J	pauljohnm		N	N
VBM	PIN	106763037	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	DEM	MAZUR, EVELYN	EEMAZ197		N	N
VBM	PIN	106763038	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	REP	MAZUR, ROBERT	ROBERT@I		N	N
VBM	PIN	126937593	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	MC CORMACK, MICHAEL S	mmccorm		N	N
VBM	PIN	126937659	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	MC CORMACK, VIRGINIA M	ginmccorm		N	N
VBM	PIN	106978110	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	MC FERRIN, ELIZABETH M	LIZMCFERI		N	N
VBM	PIN	106716424	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	MCBRIDE, DELBERT L	GUDEER12		N	N
VBM	PIN	105339479	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	MCBRIDE, LYNN A	DOGNLYN		N	N
VBM	PIN	107277672	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	DEM	MCCABE, AGNES T	AGNESMC		N	N
VBM	PIN	107089060	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	MCCABE, JENNIFER C	DENISE@M		N	N
VBM	PIN	114971037	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MCCALL, TAMARA L	BRATBLAC		N	N

VBM	PIN	107395085	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	NPA	MCCANN, JESSICA H	SKYHAWK!	N	N
VBM	PIN	114807257	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	MCCANN, MARK D	MARK.MC(	N	N
VBM	PIN	106784551	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MCCANN, MATTHEW G	TOADTOW	N	N
VBM	PIN	106734838	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	MCCANTS, CYNTHIA L	CMCCANT	N	N
VBM	PIN	107299137	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MCCARTHY, AMANDA G	mccarthy.a	N	N
VBM	PIN	106846247	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	MCCLAIN, BARBARA J		N	N
VBM	PIN	106760721	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	MCCLAIN, TIMOTHY H		N	N
VBM	PIN	107078857	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	MCCLOUD JR, ALBERT L		N	N
VBM	PIN	103271216	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	MCCLUNG, DIANE M	DIANEMCC	N	N
VBM	PIN	107237045	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	MCCLUNG, MICHAEL R	MIKE.MCC	N	N
VBM	PIN	106979512	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	MCDONALD, KAREN M	Karenmb7(	N	N
VBM	PIN	107183773	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	MCDONALD, LAURA M	MMCDONA	N	N
VBM	PIN	107183819	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	MCDONALD, MICHAEL L	mmcdonal	N	N
VBM	PIN	114336784	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MCDOWELL, DEREK S		N	N
VBM	PIN	115178902	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MCDOWELL, LYNDSEY M	LYNDSEY0	N	N
VBM	PIN	107194022	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	MCENEANEY, MARGARET E		N	N
VBM	PIN	107446769	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/30/2024	N	N	N	REP	MCGILL, CRYSTAL L	PISCESCH	N	N
VBM	PIN	106999262	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MCGUIRE, ELYSE M	ELYSEMCC	N	N
VBM	PIN	107398026	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	MCKENZIE, HEATHER H		N	N
VBM	PIN	110440798	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	MCKINNON III, LAWRENCE	HCSOFIO@	N	N
VBM	PIN	116751556	43887	45524	2024	Prima	7/30/2024	V	6/23/2024	7/16/2024	7/30/2024	N	N	N	NPA	MCKNIGHT-TAYLOR, ASHLI	ashm18@h	N	N
VBM	PIN	107166688	43887	45524	2024	Prima	8/6/2024	U	6/23/2024	7/16/2024		N	N	N	REP	MCKYTON, RICHARD J		N	N
VBM	PIN	107269694	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MCMILLEN, MELISSA R		N	N
VBM	PIN	106789989	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MCNAMEE, JUDITH F	jfmac42@g	N	N
VBM	PIN	106779515	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	MCNAMEE, MATTHEW A	ALLENMAC	N	N
VBM	PIN	107310781	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MCQUEENEY, SCOTT W	SCOTT@M	N	N
VBM	PIN	106870993	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	MCWILLIAMS, CHRISTINE L	KATATAK2	N	N
VBM	PIN	107075635	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	MCWILLIAMS, ROBERT W		N	N
VBM	PIN	107030902	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	MEEKS, SHAWN D		N	N
VBM	PIN	113951961	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	DEM	MEGGESIN, LAURIE J	laurie.meg	N	N
VBM	PIN	106759244	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MEHR, JAMES E		N	N
VBM	PIN	106853968	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MELENDEZ, ELVIN		N	N
VBM	PIN	107010201	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MELENDEZ, GERALDINE R		N	N
VBM	PIN	107410860	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	MELENDEZ, VERONICA	VMELENDE	N	N
VBM	PIN	115870637	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	MELISSAS, JAMES M	MELISSAS7	N	N
VBM	PIN	106921363	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	MELISSAS, MARIA		N	N
VBM	PIN	107242722	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	MELVIN, WALTER O	ringo1946(	N	N
VBM	PIN	106898416	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	MENDOZA, KRISTEN J	XRAYJON@	N	N
VBM	PIN	106867181	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MERSON, ROBERT B		N	N
VBM	PIN	106750441	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MERTA, JEFFREY A		N	N
VBM	PIN	106750440	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MERTA, MARY J		N	N
VBM	PIN	130744739	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	MESSANO, GIORDANA C	gmessano7	N	N
VBM	PIN	123195317	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	MESSANO, MARC T	MMESSAN(	N	N
VBM	PIN	116416427	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	MESSANO, VERLA Y		N	N
VBM	PIN	106954329	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	REP	MESSENGER, LORI A	BEACHDA7	N	N
VBM	PIN	107281244	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MEYERS JR, EDWIN D		N	N
VBM	PIN	106713262	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	MICHAEL, GAIL M		N	N
VBM	PIN	107303418	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	MICHAEL, MICHAEL C	MICHAELM	N	N
VBM	PIN	117525720	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MIDDLEBROOKS, QYIEISHA		N	N
VBM	PIN	107171728	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MIGUEL DEVAUX, MELISSA		N	N
VBM	PIN	106719441	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	NPA	MILHAM, JULEE L	SPB33736(	N	N
VBM	PIN	106768373	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MILIOTES, LOUISE M		N	N
VBM	PIN	106965356	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	MILLER JR, NORMAN W	STORMINF	N	N
VBM	PIN	110444106	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MILLER, FRONDA C		N	N
VBM	PIN	107330956	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	MILLER, KENNETH S	KENROCK(	N	N
VBM	PIN	123135354	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	Y	N	N	NPA	MILLER, LOREN J	Lorenid4@	N	N
VBM	PIN	106849937	43887	45524	2024	Prima	8/6/2024	V	6/23/2024	7/16/2024	8/6/2024	N	N	N	DEM	MILLER, MARGARET		N	N
VBM	PIN	106831844	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	MILLICAN, JAMES A	jmillica@ta	N	N
VBM	PIN	106925536	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	MILLICAN, JENNIFER K	LUVCHIBE	N	N
VBM	PIN	106870391	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	MILLIRON, MICHAEL A	VMILLIRON	N	N

VBM	PIN	106881119	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	MILLIRON, VICKI J			N	N
VBM	PIN	106803995	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MILLS III, WILLIAM H			N	N
VBM	PIN	127087255	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MILLS IV, WILLIAM H	billymills4(		N	N
VBM	PIN	106984694	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MILLS, CHRISTI H	CHMILLS1(		N	N
VBM	PIN	107111746	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	REP	MINKOFF, ELISE B			N	N
VBM	PIN	106838642	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	MINKOFF, THOMAS H			N	N
VBM	PIN	106828583	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	MINOR, SANDRA L			N	N
VBM	PIN	127256567	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MIRA, BRITTANY N	britty11mu		N	N
VBM	PIN	122929168	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MIRA, MARK J			N	N
VBM	PIN	106873012	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	DEM	MIRANDA, IRENE B	WALTIREN		N	N
VBM	PIN	106929976	43887	45524	2024	Prima	8/6/2024	U	6/23/2024	7/16/2024		N	N	N	REP	MITCHELL, EMMA D			N	N
VBM	PIN	106919734	43887	45524	2024	Prima	7/23/2024	U	6/23/2024	7/16/2024		N	N	N	REP	MITCHELL, KENNY D			N	N
VBM	PIN	113942551	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MLADINICH, JOSEPH C			N	N
VBM	PIN	114803125	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	MOLLO, SARA B	SARAMOLL		N	N
VBM	PIN	123331627	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	MONEY, JERRY H	JERRYHOV		N	N
VBM	PIN	123428378	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	MONEY, KIM Y	kimmoney:		N	N
VBM	PIN	123141251	43887	45524	2024	Prima	7/19/2024	V	6/23/2024	7/5/2024	7/19/2024	Y	N	N	DEM	MONEZ, TYLER A	TMONEZ@		N	N
VBM	PIN	120500172	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MONTOYA, MELISSA L	melissaxo(		N	N
VBM	PIN	122060203	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MOOSBRUGGER, MARY C	MCMOOS(		N	N
VBM	PIN	107428273	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	MORAN KALAMAS, KELLY L	kelanor@a		N	N
VBM	PIN	110740530	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	MORAN, AMY L	AMYMORA		N	N
VBM	PIN	107066431	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	MORAN, DAVID C	DEMNOLE!		N	N
VBM	PIN	107196812	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MOREA, MICHAEL E			N	N
VBM	PIN	115387378	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MOREAU, CASSANDRE A	CASSANDI		N	N
VBM	PIN	106966049	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	NPA	MORRIS JR, ROBERT J	ROBERTJM		N	N
VBM	PIN	106992782	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MORRIS, ANNE C	ANNECMO		N	N
VBM	PIN	106968224	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	MORSE, SUSAN C			N	N
VBM	PIN	107169214	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	NPA	MORY, DANIEL E	DEVANMO		N	N
VBM	PIN	107209276	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	MORY, KRISTEN L	KRISTENM(		N	N
VBM	PIN	107085235	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	MOUSTOPOULOS, LORA L			N	N
VBM	PIN	106844295	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	MUHRLIN, CHRISTOPHER J			N	N
VBM	PIN	106834294	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	DEM	MULLEN, STEPHEN P	SMULLENF		N	N
VBM	PIN	120834461	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	MULLINS, SHANE A	shane.mul		N	N
VBM	PIN	120284601	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	MUNGER, JAMES M	jmichaelm		N	N
VBM	PIN	106910978	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	MURRAY, JUDY M	JUDYMURF		N	N
VBM	PIN	114299077	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	MURRAY, LORI A	LORI.A.MU		N	N
VBM	PIN	114299072	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	MURRAY, STEVEN J	STEVEN.J.M		N	N
VBM	PIN	106745135	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MURREN, KEVIN P			N	N
VBM	PIN	121079872	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	MYERS, ARIANA J			N	N
VBM	PIN	106820914	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	MYERS, LISA L	LMEYERS@		N	N
VBM	PIN	106808980	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	MYERS, TERRY E	TEMYERS@		N	N
VBM	PIN	106881081	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	MYERS, TODD F			N	N
VBM	PIN	107274424	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	NPA	MYJAK, VICKI I	COLLECTC		N	N
VBM	PIN	107379868	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	CPF	MYRTHIL, JAMES	JAMESMYF		N	N
VBM	PIN	107058490	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	NAGIN, AGATHA M			N	N
VBM	PIN	106765382	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	NAGIN, ROBERT D			N	N
VBM	PIN	106797499	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	NALVEN, KAREN W			N	N
VBM	PIN	106885868	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	NALVEN, LAWRENCE R			N	N
VBM	PIN	123242783	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	NALVEN, MACKENZIE T	mackenzie		N	N
VBM	PIN	106915511	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	NAVE, TONIA J	tjn919@ho		N	N
VBM	PIN	106926219	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	NPA	NEELY, MERRIE B			N	N
VBM	PIN	107085889	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	DEM	NELSON, CATHLEEN R			N	N
VBM	PIN	107427864	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	NELSON, JEANNE S	jeanne_nel		N	N
VBM	PIN	107427865	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	NELSON, KENNETH E	SAKNELSC		N	N
VBM	PIN	106907367	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	NEPOTE, HOLLY H			N	N
VBM	PIN	106764808	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	NEPOTE, ROBERT A			N	N
VBM	PIN	106716133	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	NESTOR, DENISE C			N	N
VBM	PIN	106836567	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	NESTOR, THOMAS P			N	N
VBM	PIN	106739817	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	NEUMANN, BRENDA W	DNKODA@		N	N
VBM	PIN	107112346	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	NGUYEN, JERRY	firepro329(		N	N

VBM	PIN	107330432	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	NGUYEN, LORA D			N	N
VBM	PIN	107083184	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	NGUYEN, MARY R			N	N
VBM	PIN	107228890	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	NICHOLS, AMELIA J	REN42693		N	N
VBM	PIN	115408632	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	NICOLE, CHRISTINE			N	N
VBM	PIN	106994648	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	NILES, GERALD B			N	N
VBM	PIN	106840687	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	NILES, ROSA G			N	N
VBM	PIN	106881878	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	DEM	NORRIS, LILIAN F			N	N
VBM	PIN	106940829	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	Y	N	N	REP	NORSWORTHY, ZACHARY I	ZACH.NOR		N	N
VBM	PIN	107111878	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	NORTON, ALICIA M	AMHILL@L		N	N
VBM	PIN	118710207	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	NOTTINGHAM, KHEDJIA N			N	N
VBM	PIN	117504733	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	Y	N	Y	NPA	NOVINSKI, KELLY M	KELLYNOV		N	N
VBM	PIN	107035274	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	NUGENT, DAVID A	DK.NUGEN		N	N
VBM	PIN	119531111	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	NURAJ, BRITNEY L			N	N
VBM	PIN	106964090	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	NYHART, JACOB E	JAKENYHA		N	N
VBM	PIN	107441411	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	OBENAUF, ALEX J			N	N
VBM	PIN	107192310	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	OLSEN, ELIZABETH M	BETH.M.OI		N	N
VBM	PIN	107379515	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	OLSEN, ERIC R	olsen.fami		N	N
VBM	PIN	121787315	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/16/2024		Y	N	Y	REP	OLSEN, ERICA N	erica_olse		N	N
VBM	PIN	120377682	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/16/2024		Y	N	Y	REP	OLSEN, JUSTIN J	justinolsen		N	N
VBM	PIN	107387759	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	OLSEN, SHARON AS	olsen_fami		N	N
VBM	PIN	107175670	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	REP	OMSLAER, RHONDA L			N	N
VBM	PIN	125687079	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	O'NEILL, COLLEEN P			N	N
VBM	PIN	127881826	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/5/2024	8/20/2024	Y	N	N	DEM	OPLINGER, BRIAN S	BRIAN.S.O		N	N
VBM	PIN	120702806	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	Y	N	Y	NPA	ORTEGA, ERICA N	ERICAORT		N	N
VBM	PIN	120514087	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	Y	N	N	DEM	ORTEGA, PHILLIP N	PHILLIP.OF		N	N
VBM	PIN	107273260	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	OSGOOD II, TIMOTHY R	T.OSGOOD		N	N
VBM	PIN	107769187	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	IND	OSTER, BROOKE C	boster121(		N	N
VBM	PIN	106907651	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	NPA	OVERBY, ROGER L	RLO1500@		N	N
VBM	PIN	106782316	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	OVERTON, DOLORES V	OWILLIAM(		N	N
VBM	PIN	106792827	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	OVERTON, WILLIAM H	OWILLIAM(		N	N
VBM	PIN	107114217	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	REP	OWEN, BARBARA J	larrgo@ms		N	N
VBM	PIN	107112304	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	REP	OWEN, LARRY G	LARRGO@		N	N
VBM	PIN	106729207	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	PACE, MICHAEL S	POPPI507(		N	N
VBM	PIN	106870843	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	PAGE, NANCY M	NPAGE313		N	N
VBM	PIN	120367831	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	PALMER, DOUGLAS W	douglaswp		N	N
VBM	PIN	118952422	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	PALMER, MEGAN A	nursepalm		N	N
VBM	PIN	107148394	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	DEM	PALMERI, JOANN A	JPALMERI1		N	N
VBM	PIN	107060408	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	PALUMBO, DEBORAH A			N	N
VBM	PIN	107250516	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	PAREDES, RUBY	Rubytue20		N	N
VBM	PIN	107078122	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	PARKER, PATRICIA A	TENSEI14@		N	N
VBM	PIN	123021448	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	PASHOLK, MARY L			N	N
VBM	PIN	118293664	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	DEM	PATEL, JAY DN	jdpatel773		N	N
VBM	PIN	107232077	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	PATSALIDES, HARRY G	FLSNEWES		N	N
VBM	PIN	106779218	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	PATTERSON, JOHNNA R	JOHNNAB/		N	N
VBM	PIN	107001286	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	PATTERSON, MARK K			N	N
VBM	PIN	120483893	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	PAUL, LINDA	LINDAPAU		N	N
VBM	PIN	106662367	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	PAULLIN, JENNIFER S	jspaullin@		N	N
VBM	PIN	107345299	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	REP	PAULSEN, DAVID F	D.F.PAULS		N	N
VBM	PIN	116311723	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	PAVLIDAKEY JR, GEORGE P			N	N
VBM	PIN	106731539	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	PAYNE, PATRICIA J	PAYNEPAT		N	N
VBM	PIN	127149257	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	PEAK, MATTHEW M			N	N
VBM	PIN	107436261	43887	45524	2024	Prima	8/10/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	PEARLMAN, LEE M	LPEARLMA		N	N
VBM	PIN	125445277	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	NPA	PEREZ III, LEONARDO BT	L.PEREZ84		N	N
VBM	PIN	110423873	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	PEREZ, EDUARDO J			N	N
VBM	PIN	107094427	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	PEREZ, LINDA S	LINDA.PER		N	N
VBM	PIN	110442375	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	REP	PEREZ, SUZANNE E			N	N
VBM	PIN	107097483	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	NPA	PEREZ-BOOK, SASHA J	sashaperez		N	N
VBM	PIN	116118809	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	PERFETTI-REID, ANJUM W	anjum.perf		N	N
VBM	PIN	117817081	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	PERL, BRIGETTE E			N	N
VBM	PIN	106899676	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	PERRY, KATHLEEN S	HOCKEYLA		N	N

VBM	PIN	107074740	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	PERRY, LINDA V	LINDAPERI	N	N
VBM	PIN	100193680	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	PETERS JR, MARTIN J		N	N
VBM	PIN	106894092	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	PETERS, KATHLEEN M	Kathleenpe	N	N
VBM	PIN	115526914	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	PETERS, KRISTA HT	KRISTATED	N	N
VBM	PIN	107321732	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	PETREN, CONOR J		N	N
VBM	PIN	110436802	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	PETTYGROVE, ARTHUR G	ARTPETTY(	N	N
VBM	PIN	107139938	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	PETTYGROVE, NANCY C	CBLAIR2@	N	N
VBM	PIN	107369233	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	PHELPS, BRIAN A		N	N
VBM	PIN	111989218	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	PHELPS, JILLIAN R		N	N
VBM	PIN	120621116	43887	45524	2024	Prima	7/23/2024	U	6/23/2024	7/16/2024		N	N	N	REP	PHIPPS, MARK		N	N
VBM	PIN	107251728	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	NPA	PICARD, CHRISTINE A		N	N
VBM	PIN	106830345	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	PIERCE, DEBRA J		N	N
VBM	PIN	106706236	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	PIERCE, PAUL J		N	N
VBM	PIN	106733717	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	PIERSON III, JOSEPH E	JEP595@M	N	N
VBM	PIN	126907744	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	PIKE, VITA M		N	N
VBM	PIN	106965632	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	PILAT, GEORGE	UH1ABC0I	N	N
VBM	PIN	107120162	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	PILEGGI, SUZANNE M	SMPILEGG	N	N
VBM	PIN	106907580	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	PINGOR, BRIAN R		N	N
VBM	PIN	126054974	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	PISTILLO, MARK	markcsm@	N	N
VBM	PIN	107362394	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/16/2024		Y	N	N	NPA	PITTS, MARIO L	Medicpitts	N	N
VBM	PIN	106895710	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	PLATT, MICHAEL G	MICHAELP	N	N
VBM	PIN	106862537	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	POLING, STEVEN T	STEVEPOL	N	N
VBM	PIN	122660603	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	DEM	POSTLE, STEVEN G	STEVENPO	N	N
VBM	PIN	106852811	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	POULAKIS, PAMELA E		N	N
VBM	PIN	106867435	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	POULIN, CLAUDIA J		N	N
VBM	PIN	107300859	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	DEM	POWELL, TRACY L	trepowell2	N	N
VBM	PIN	122867108	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	PRIANCIANI, MATTHEW D	M.PRIANCI	N	N
VBM	PIN	119120264	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	NPA	PRUITT, KIMBERLY D	KADRAKE@	N	N
VBM	PIN	110389613	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	DEM	PRYOR, DOROTHY R	drpryor22@	N	N
VBM	PIN	106763212	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	REP	PULHAM II, MICHAEL T	ACE51@CI	N	N
VBM	PIN	106893003	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	PUPKE, TIMOTHY C		N	N
VBM	PIN	106888856	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	QUANDT, ROBBYN K		N	N
VBM	PIN	106715360	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	QUEEN, WILLIAM M	WILLIAMQI	N	N
VBM	PIN	106750811	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	QUESADA, FRANK		N	N
VBM	PIN	102937035	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	DEM	QUICK, GENEVIEVE C	GENQUICK	N	N
VBM	PIN	106880590	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	REP	QUINN, EARL E	GGUINN19	N	N
VBM	PIN	126629261	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	NPA	RAHILL, CYNTHIA M		N	N
VBM	PIN	126629264	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	NPA	RAHILL, JAMES G		N	N
VBM	PIN	107328915	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	RAISCH, STEVEN D		N	N
VBM	PIN	106950624	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	RAMSEY, GREGORY T	GREGHELE	N	N
VBM	PIN	106894025	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	REP	RANDALL, EDMOND T		N	N
VBM	PIN	107274785	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	DEM	RAPOSA, MICHAEL J	MJR@GATE	N	N
VBM	PIN	122732644	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	RATHKE, SARAH E	sarahrathk	N	N
VBM	PIN	106939413	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	RAVEN, DIANNE M		N	N
VBM	PIN	114588036	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	RAWSTHORNE, CRISTINA J	CRAWS88(	N	N
VBM	PIN	118240433	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	RAWSTHORNE, MARK E	RAWS22@	N	N
VBM	PIN	125374298	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	RAY, SALINA D	SALINAFLA	N	N
VBM	PIN	117694034	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	RAY, STEVEN M	SRAY2@H(	N	N
VBM	PIN	121467925	43887	45524	2024	Prima	8/11/2024	V	6/23/2024	7/16/2024	8/11/2024	N	N	N	REP	RAYMAN, JAMIE L	JLS447@G	N	N
VBM	PIN	115670575	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	REBETTI, CYDNEY M	CYDNEY.S	N	N
VBM	PIN	107304055	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	REBETTI, NICHOLAS J	NREBETTI(	N	N
VBM	PIN	106797298	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	REDMOND, JOHN F		N	N
VBM	PIN	106902281	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	REED, MITCHELL B		N	N
VBM	PIN	113987748	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	REEVES, AMANDA C	AMANDA@	N	N
VBM	PIN	116174473	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	REEVES, JONATHAN R		N	N
VBM	PIN	106846639	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	REGAN, LESA J	LESAJ65@(	N	N
VBM	PIN	114154913	43887	45524	2024	Prima	8/14/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	REID IV, RALPH O		N	N
VBM	PIN	107099694	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	REP	REID, RENEE S		N	N
VBM	PIN	106936824	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	REP	REID, SCOTT E		N	N
VBM	PIN	104043813	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/16/2024		Y	N	N	REP	REINAUER, ALVIN J		N	N

VBM	PIN	107322397	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	REWIS, MELINDA A	MELHALOS	N	N
VBM	PIN	106855571	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	REYNOLDS, LENORE	lenoreinflo	N	N
VBM	PIN	106780013	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	REZANKA, KAREN T		N	N
VBM	PIN	106780012	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	REZANKA, THOMAS		N	N
VBM	PIN	106912697	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	RIBA, MARI E		N	N
VBM	PIN	106971122	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	RICE, LYNN A		N	N
VBM	PIN	106832439	43887	45524	2024	Prima	7/23/2024	U	6/23/2024	7/16/2024		N	N	N	DEM	RICHARDS, BEVERLY S	BRICHARD	N	N
VBM	PIN	107296659	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	RICHARDS, CYNTHIA E	RICHARDS	N	N
VBM	PIN	106732893	43887	45524	2024	Prima	7/26/2024	U	6/23/2024	7/16/2024		N	N	N	DEM	RICHARDS, DAVID C	BRICHARD	N	N
VBM	PIN	107277503	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	DEM	RICHARDS, RONALD W	RWRICHAF	N	N
VBM	PIN	107441280	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	RICHARDSON, CHRISTINE .	CHRISSYR	N	N
VBM	PIN	107017143	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	RICHARDSON, EVAMARIE K	Evedietrich	N	N
VBM	PIN	107211923	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	RICHARDSON, ROBERT W		N	N
VBM	PIN	124204732	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	RIDLON, LIAM C		N	N
VBM	PIN	106948666	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	NPA	RIESER, HANNELORE M		N	N
VBM	PIN	106920425	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	DEM	RIESER, JAMES D	STORMLJ@	N	N
VBM	PIN	106818799	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	RIGGLE, KAY M		N	N
VBM	PIN	106902152	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	RILEY, CHRISTOPHER T		N	N
VBM	PIN	111386786	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	DEM	RIPLEY, JESSICA S		N	N
VBM	PIN	107228436	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	REP	RIVERA SR, JAIME	R.JAIME5@	N	N
VBM	PIN	107267737	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	RIVERA, ANAMARIE E		N	N
VBM	PIN	106832230	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	IND	RIVERA-RUIZ, NICOLAS	XNRR352@	N	N
VBM	PIN	106813467	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	ROBBINS, GARY P	GARY.ROB	N	N
VBM	PIN	107144196	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	ROBERTS, SHIRLEY A		N	N
VBM	PIN	107404999	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	ROBINSON, MICHELLE D	mdrobinso	N	N
VBM	PIN	106826370	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	ROBINSON, STEPHEN D		N	N
VBM	PIN	114849248	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	ROCKSWOLD, CODY		N	N
VBM	PIN	107245019	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	ROCKSWOLD, MONICA A	MSULKOW	N	N
VBM	PIN	110725293	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	DEM	RODRIGUEZ, RACHEL M		N	N
VBM	PIN	106800853	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	Y	N	N	REP	ROGERS JR, WILBUR W	FLORIDAFI	N	N
VBM	PIN	106931219	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	ROHRMANN, GEORGE F	grohrman@	N	N
VBM	PIN	106960399	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	ROHRMANN, PAULINE M	PROHRMA	N	N
VBM	PIN	107431662	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	ROLLINS, CHRISTOPHER H	CHRISROL	N	N
VBM	PIN	107058908	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	ROLLINS, MELISSA S	MELISSAR	N	N
VBM	PIN	106902135	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	ROMINE, STEPHEN L		N	N
VBM	PIN	107020906	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	ROODHOUSE, ERICA KS		N	N
VBM	PIN	114011780	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	ROPER, IAN J		N	N
VBM	PIN	114800059	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	ROPER, SHARON A	SAROPER2	N	N
VBM	PIN	106803731	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	ROSE, DONNA J	FLORIDAAI	N	N
VBM	PIN	115943775	43887	45524	2024	Prima	8/6/2024	V	6/23/2024	7/16/2024	8/6/2024	N	N	N	REP	ROSENBERGER JR, GEORG	GROSE783	N	N
VBM	PIN	115943894	43887	45524	2024	Prima	8/6/2024	V	6/23/2024	7/16/2024	8/6/2024	N	N	N	REP	ROSENBERGER, MICHELLE	CROSE997	N	N
VBM	PIN	100307077	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	ROSS, ADAM M		N	N
VBM	PIN	106716641	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	ROSS, THOMAS W		N	N
VBM	PIN	106788329	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	REP	ROSSEY, SUSAN M	SROSSEY@	N	N
VBM	PIN	125094698	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/5/2024	7/22/2024	Y	N	N	DEM	ROTH, JONATHAN D	ROTHJ918(	N	N
VBM	PIN	125685424	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	ROUGIER, LAURA A	Lrougier08	N	N
VBM	PIN	106938786	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	ROUNDTREE, JOANN D	JOANROUI	N	N
VBM	PIN	120069255	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/5/2024		Y	N	N	IND	RUGA, ANDREW J	STRENGTH	N	N
VBM	PIN	106683003	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	Y	N	Y	DEM	RUGGHIA, ANGELINA M	angelina.ru	N	N
VBM	PIN	120886575	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	RUSSELL, DANIELLE Y		N	N
VBM	PIN	106718442	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	RUSSELL, YVELLE K		N	N
VBM	PIN	106889559	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	RUVA, JOSEPH J	RUVA@US	N	N
VBM	PIN	114824039	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	RYCZEK, RYAN B	RRYCZEK@	N	N
VBM	PIN	124392361	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	SALVIANI, SARAH A		N	N
VBM	PIN	106823366	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	DEM	SAMAHA, CHARLES M	CMALSAM(	N	N
VBM	PIN	106902758	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	DEM	SAMIS, KEELA R	SSAMIS@T	N	N
VBM	PIN	106920702	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	SAMIS, SCOT E	SSAMIS@T	N	N
VBM	PIN	107236727	43887	45524	2024	Prima	7/19/2024	V	6/23/2024	7/16/2024	7/19/2024	N	N	N	REP	SANABRIA LOPEZ, MYRNA		N	N
VBM	PIN	107188177	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	SANDELL, SHANA C	Shanasanc	N	N
VBM	PIN	107773404	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	SASSER, ELIZABETH A	sasserb1@	N	N

VBM	PIN	107342387	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	SAUNDERS, CHARITY T	MSEMPOW	N	N
VBM	PIN	106772294	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	SAUTER, LINDA S		N	N
VBM	PIN	119458485	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	SAVOIE, AMANDA M		N	N
VBM	PIN	107229269	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	SAXER, DONNA S		N	N
VBM	PIN	106787906	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	NPA	SCACCA, JOHN A	JSCACCA1	N	N
VBM	PIN	107052668	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	SCHAFER III, WALTER L		N	N
VBM	PIN	107009328	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	NPA	SCHILLING, DIANE L	DEESCHIL	N	N
VBM	PIN	106895766	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	SCHLERF, CHRISTINE M	akboundar	N	N
VBM	PIN	116205018	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	SCHLONEGER, JAY R	PINELLAS/	N	N
VBM	PIN	107249861	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	SCHMIDT, DEBRA L	SCHMIDTS	N	N
VBM	PIN	124206001	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	SCHMUECK, DAVID B	DAVIDSCH	N	N
VBM	PIN	107067963	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	SCHNEIDER, PAMELA S	MISSPAM2	N	N
VBM	PIN	105223758	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	SCHNEIDER, SHEILA E		N	N
VBM	PIN	106909319	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	SCHNEIDER, STANLEY D	NASCARST	N	N
VBM	PIN	106768032	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	SCHOBEL, GERHARDT B		N	N
VBM	PIN	106762992	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	SCHOBEL, TERRY L		N	N
VBM	PIN	106919539	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	SCHOFIELD SR, TRACEY G	tschofield1	N	N
VBM	PIN	114587500	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	SCHRAYER, BRET A	usffishin@	N	N
VBM	PIN	107262773	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	SCHRAYER, STEPHANIE H	stephanie4	N	N
VBM	PIN	107135031	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	SCHULER JR, FREDERICK R		N	N
VBM	PIN	120704858	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	DEM	SCHWARTZ, CHERYL J		N	N
VBM	PIN	120612491	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	DEM	SCHWARTZ, MICHAEL		N	N
VBM	PIN	111235180	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	DEM	SCOTT III, NATHAN L	nlscott3@g	N	N
VBM	PIN	110871333	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	DEM	SCOTT, ANGELA LA	angielarter	N	N
VBM	PIN	106821944	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	REP	SCOTT, DENIS E		N	N
VBM	PIN	107258535	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	SCOTT, KELLEN C	KELMEL@T	N	N
VBM	PIN	107109467	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	SCOZZAFAVA, JOHN S	jscozzafava	N	N
VBM	PIN	112009338	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	SCRUGGS III, ROBERT D		N	N
VBM	PIN	107664549	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	SCRUGGS, NATALIE C	NCROZIER	N	N
VBM	PIN	107010768	43887	45524	2024	Prima	7/30/2024	V	6/23/2024	7/16/2024	7/30/2024	Y	N	N	NPA	SEARS, STEVEN M		N	N
VBM	PIN	107085952	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	SEIB, SELENA S	MSSEIB@C	N	N
VBM	PIN	106759386	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	DEM	SEIBERT, GEORGE H	GSEIBERT(	N	N
VBM	PIN	106764439	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	DEM	SEIBERT, KAREN A	karenseibe	N	N
VBM	PIN	107216149	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	SENA, CHRISTIE L	csena4100	N	N
VBM	PIN	106939558	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	SENA, MARK J	csena4100	N	N
VBM	PIN	121269928	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	SETH, JOSHUA	joshuaseth	N	N
VBM	PIN	102115982	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	DEM	SEVERINSEN, CYNTHIA S		N	N
VBM	PIN	114777743	43887	45524	2024	Prima	8/10/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	SEWAR, SANATOSHA Y	Toshaandn	N	N
VBM	PIN	106773377	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	SHAMES, BARBARA A		N	N
VBM	PIN	106984885	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	SHANE, LARA G		N	N
VBM	PIN	106983468	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	SHANNON, EDWARD P		N	N
VBM	PIN	107257513	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	SHAPIRO, ANNETTE S	ANNETTES	N	N
VBM	PIN	107295639	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	SHAPIRO, MARTIN J	MARTIN.X.I	N	N
VBM	PIN	107205253	43887	45524	2024	Prima	8/8/2024	U	6/23/2024	8/9/2024		N	N	N	DEM	SHAW, ANN M	shaw2160(	N	N
VBM	PIN	107053597	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	SHEAREY, CLOVER M	CSHEAREY	N	N
VBM	PIN	117400361	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	SHEARN, JASON R	JASON.SHI	N	N
VBM	PIN	106515835	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	DEM	SHEARON, TERESA M		N	N
VBM	PIN	107253059	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	SHEEHAN, ABIGAIL D	abby.sheel	N	N
VBM	PIN	107267049	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	NPA	SHEEHAN, CHRISTOPHER I	c@shhn.m	N	N
VBM	PIN	113146671	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	SHEEHY, MARCY F	MARCYFS1	N	N
VBM	PIN	106756466	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	SHEESLEY, EMMAJEAN K	JSHEESLEY	N	N
VBM	PIN	107400974	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	SHEESLEY, JOHN W	JSHEESLEY	N	N
VBM	PIN	120670765	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	SHERMAN, MICHAEL B	TAYLA-022	N	N
VBM	PIN	111842382	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	SHERWOOD, AMBER M	Ambershe	N	N
VBM	PIN	107436995	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	REP	SHIBLEY, MARTHA E		N	N
VBM	PIN	106706108	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	SHIELS III, ROBERT J	rshiels@ta	N	N
VBM	PIN	106706107	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	SHIELS, BARBARA A	BASHIELS(	N	N
VBM	PIN	107014627	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	SHOTTO, MARY E	MESHOTTC	N	N
VBM	PIN	106823741	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	DEM	SIBERSKI, ROBERT S		N	N
VBM	PIN	121798410	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	SILBERMAN, GABRIELLE C	GABRIELLE	N	N

VBM	PIN	107107068	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	SILLIMAN, GREGG J	SILLIMAN1	N	N
VBM	PIN	107384021	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	NPA	SILVERBOARD, JILL S	JILLSILVER	N	N
VBM	PIN	107383317	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	SILVERBOARD, REID	RSILVERBC	N	N
VBM	PIN	127881831	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/5/2024	8/20/2024	Y	N	Y	DEM	SIMONS, CATHERINE CS	CATHERIN	N	N
VBM	PIN	106782701	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	SIMONS, DAWN C	DAWNCLA	N	N
VBM	PIN	107068547	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	SINCLAIR, LINDSAY P	LINDSAYP2	N	N
VBM	PIN	115422360	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	SINCLAIR, MATTHEW C	MATTHEWS	N	N
VBM	PIN	107183649	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	REP	SINGSON, MARIA T	MSINGSON	N	N
VBM	PIN	107026303	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	REP	SINGSON, ROBERTO B	MSINGSON	N	N
VBM	PIN	115515765	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	SKIPPER, JACK		N	N
VBM	PIN	106879496	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	SKIPPER, JENEE L		N	N
VBM	PIN	106741680	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	SMITH JR, JAMES H		N	N
VBM	PIN	107267305	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	DEM	SMITH, ANTIONETTE		N	N
VBM	PIN	106728702	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	SMITH, BARRY S	BARRYSSM	N	N
VBM	PIN	118209281	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	SMITH, CHRISTOPHER P		N	N
VBM	PIN	106421413	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	SMITH, DALE L	zone9911@	N	N
VBM	PIN	106711389	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	DEM	SMITH, EULA J		N	N
VBM	PIN	106895697	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	SMITH, HEATHER J		N	N
VBM	PIN	121773042	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	DEM	SMITH, KATHY	KASMITH8	N	N
VBM	PIN	107396234	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	SMITH, PAMELA L		N	N
VBM	PIN	106717322	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	SMITH, RHONDA L		N	N
VBM	PIN	101933250	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	SNYDER, JEFFREY R	DOGCOPP	N	N
VBM	PIN	106819701	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	SODERLUND JR, RICHARD	RSODERLL	N	N
VBM	PIN	107384214	43887	45524	2024	Prima	8/17/2024	P	6/23/2024	7/16/2024		N	N	N	REP	SOKOLOWSKI, NICOLE L		N	N
VBM	PIN	106904719	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	NPA	SOLC, ZUCEL	ZUCELSOL	N	N
VBM	PIN	115873324	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	NPA	SOLEY, GERALD E	GESOLEY@	N	N
VBM	PIN	107087452	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	SOLOMON, MARGARET M	PSOLOMO	N	N
VBM	PIN	110778495	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	SPALL, MELINDA R	Marvin212	N	N
VBM	PIN	123542924	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	NPA	SPERGEL, MINDY S	mspergel@	N	N
VBM	PIN	120978979	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	DEM	SPINOGATTI, STEPHEN J	sspinogatti	N	N
VBM	PIN	106893998	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	SPIROS, DENISE E		N	N
VBM	PIN	106894093	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	SPIROS, GUY M	spiros88@	N	N
VBM	PIN	107446675	43887	45524	2024	Prima	7/15/2024	U	6/23/2024	7/5/2024		Y	N	N	REP	ST CERE, MINDY M	MSTCERE@	N	N
VBM	PIN	114167434	43887	45524	2024	Prima	7/15/2024	U	6/23/2024	7/5/2024		Y	N	N	DEM	ST CERE, SCOTT A	SSTCERE@	N	N
VBM	PIN	106633938	43887	45524	2024	Prima	8/18/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	STANEY, TIMOTHY P		N	N
VBM	PIN	107240103	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	STANLEY II, JAMES C	jcstanley2(	N	N
VBM	PIN	107390426	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	STANLEY, JASON R		N	N
VBM	PIN	106834860	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	DEM	STAR, BJ	bjstar@att.	N	N
VBM	PIN	106821504	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	STAVROPOULOS, HARRY P		N	N
VBM	PIN	106881889	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	STEARNS, ANNA P	astearns63	N	N
VBM	PIN	106976156	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	STEINBACHER, JOAN M	jmshome1	N	N
VBM	PIN	115694838	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	STEINER, STACEY L	sreed0614	N	N
VBM	PIN	118900082	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	NPA	STEVENS, ARLENE		N	N
VBM	PIN	106754506	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	DEM	STEVENSON, BRENDA K	BSTEVENS	N	N
VBM	PIN	106759372	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	STEWART, ROBERT D		N	N
VBM	PIN	107124386	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	DEM	STILLWAUGH JR, DONALD I		N	N
VBM	PIN	113787261	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	STORCK, DEBORAH P	DPSTORCK	N	N
VBM	PIN	106782043	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	STRAIGHT, LAURIE L	BUGSMOM	N	N
VBM	PIN	107411526	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	STRAW, BREANN S	BSSTRAW@	N	N
VBM	PIN	106940839	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	STRAW, WESLEY T	WTS@EME	N	N
VBM	PIN	107140966	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	STRIEDER, SUSAN		N	N
VBM	PIN	106906678	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	NPA	STRYJEWSKI, PAULA S		N	N
VBM	PIN	116770457	43887	45524	2024	Prima	7/1/2024	P	6/23/2024	7/16/2024		Y	N	N	REP	STUDT, COREY DW	bullstudt@	N	N
VBM	PIN	117723880	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	SULLIVAN, COURTNEY A	COURTNEY	N	N
VBM	PIN	106806931	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	SULLIVAN, DAVID M	DAVESULL	N	N
VBM	PIN	106752122	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	REP	SULLIVAN, DEBRA P		N	N
VBM	PIN	106866481	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	SULLIVAN, PATSY J	PJUSULLY5	N	N
VBM	PIN	107443856	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	SULLIVAN, TIMOTHY F	TIM@RPSL	N	N
VBM	PIN	115873341	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	NPA	SUN-SOLEY, MARY	SOLEYMS@	N	N
VBM	PIN	106880698	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	REP	SURPLUS, KAREN L	KARENLSU	N	N

VBM	PIN	107036891	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	SWANGO, CALI M		N	N
VBM	PIN	106924757	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	SWANGO, JOSHUA E	joshuaswa	N	N
VBM	PIN	110412322	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	SWANN JR, RICHARD H	RSWANN5	N	N
VBM	PIN	110533381	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	SWANN, JUDITH L	JLSWANN5	N	N
VBM	PIN	110862573	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	SWENSSON, JO ANNE M	JOSWENSS	N	N
VBM	PIN	115952800	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	SWOCH, SARAH R		N	N
VBM	PIN	106872286	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	NPA	SWOPE, SCOTT P		N	N
VBM	PIN	106786786	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	DEM	SZABO JR, STEPHEN A	STEVESZAI	N	N
VBM	PIN	107202493	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	NPA	SZYNAL, LAURA S	DABEARS0	N	N
VBM	PIN	107153470	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	NPA	TAILLON, HOPE C	HOPETAILL	N	N
VBM	PIN	110704804	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	Y	N	Y	REP	TALBOT, DIANE P	DIANETALE	N	N
VBM	PIN	107560189	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	TALLON, PAMELA E		N	N
VBM	PIN	106804177	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	TATEM, CHARLES A	CHARLESA	N	N
VBM	PIN	107137152	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	TAYLOR III, GREGG W	GWTANT@	N	N
VBM	PIN	106989680	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	TAYLOR, BRIAN A		N	N
VBM	PIN	107096635	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	TAYLOR, CHRISTOPHER H	CHRIST749	N	N
VBM	PIN	120293832	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	Y	N	N	NPA	TAYLOR, ROBERT C	bobtay18@	N	N
VBM	PIN	121082258	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	DEM	TEALL, CLAYTON E	csac.tl@ve	N	N
VBM	PIN	104846493	43887	45524	2024	Prima	8/6/2024	U	6/23/2024	7/16/2024		N	N	N	NPA	TEJERA, ADRIAN N	ADRIAN.TE	N	N
VBM	PIN	107223266	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	TELLIER, CAROLYN S	SUE.TELLIE	N	N
VBM	PIN	106718378	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	TEZZAS, JAMES M	tezbal@ij.r	N	N
VBM	PIN	106803710	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	THATCH, JOHN D	NHOJT@AC	N	N
VBM	PIN	106813412	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	THATCH, SONYA G	sonyathatc	N	N
VBM	PIN	114686036	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	THERIAULT, PAUL J	PT22461@	N	N
VBM	PIN	106798075	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	THIBODEAUX, JANICE J	JJ.TIBY@GI	N	N
VBM	PIN	126083960	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	DEM	THOMAS, KATHERINE J	kimoreillytl	N	N
VBM	PIN	106880424	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	THOMAS, MIKE O		N	N
VBM	PIN	106751326	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	DEM	THOMAS, SALLY A	SAT867@C	N	N
VBM	PIN	106859488	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	THOMPSON, DANITA G		N	N
VBM	PIN	106964753	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	THOMPSON, LITONYA R		N	N
VBM	PIN	106763178	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	DEM	THOMPSON, VELMA I		N	N
VBM	PIN	106680156	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	TIDWELL, SHARON C	SHARON.B	N	N
VBM	PIN	106999096	43887	45524	2024	Prima	8/10/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	TIEDER, REBECCA SG	BECCA@C	N	N
VBM	PIN	121519658	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	TIEHAARA, JOHN A	JAYTIEHAA	N	N
VBM	PIN	106840033	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	TILLIA, JOHN H	MAJORNOI	N	N
VBM	PIN	106899542	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	TILLIA, SANDRA S	SANDYSEN	N	N
VBM	PIN	107039233	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	TILNEY, DOUGLAS C		N	N
VBM	PIN	115316334	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	TIMPERIO, AARON M		N	N
VBM	PIN	106836842	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	TINSLEY, LOIS C		N	N
VBM	PIN	107046842	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	TOBERGTE, JACALINE W		N	N
VBM	PIN	107047018	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	TOBERGTE, JEFFREY A		N	N
VBM	PIN	107308111	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	TOLLIVER, DANIELA N		N	N
VBM	PIN	128225461	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	TOMKIEL, DOC	doctomkie	N	N
VBM	PIN	106937194	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	TOMKO, CARL J	CTOMKO1	N	N
VBM	PIN	107301731	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	DEM	TOMLINSON, JESSICA M		N	N
VBM	PIN	106893200	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	TORCH, SAM J		N	N
VBM	PIN	118214927	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	TORR, JENNIFER M		N	N
VBM	PIN	112343552	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	DEM	TORRES, DAVID J		N	N
VBM	PIN	107384070	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	NPA	TORRES, ELVING L	JUDGEELV	N	N
VBM	PIN	105018682	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	DEM	TORRISI, KAREN M	kmtorrisi@	N	N
VBM	PIN	106711777	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	TOSI JR, LAWRENCE C		N	N
VBM	PIN	107141227	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	TOSI, ANGELA J	ANGELATC	N	N
VBM	PIN	106855239	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	TOSI, DEBORAH W		N	N
VBM	PIN	107219134	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	TOUART, BARRY T	BTOUART@	N	N
VBM	PIN	110985174	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	TOUART, CARMELLA F	CARMELLA	N	N
VBM	PIN	106796629	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	TRAGOS, DONNA M	OTHEOS33	N	N
VBM	PIN	106760853	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	TRESCA, CAROL M	CTRESCA@	N	N
VBM	PIN	106875602	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	TRUMP, CHERIE L	CLTRUMPE	N	N
VBM	PIN	106986680	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	REP	TSAGARATOS, PETER		N	N
VBM	PIN	106987991	43887	45524	2024	Prima	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N	REP	TSAGARATOS, THEONIKI		N	N

VBM	PIN	107152121	43887	45524	2024	Prima	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N	REP	TULLY, THOMAS J		N	N
VBM	PIN	106849164	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	TUTTLE, KATHRYN D	kdsmk@ac	N	N
VBM	PIN	106574582	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	IND	TWARDOWSKI, DEREK D		N	N
VBM	PIN	128433161	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	DEM	TWOMEY, MAUREEN S	MSTWOME	N	N
VBM	PIN	117892482	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	TYDEMAN, SCOTT	SCOTT.TYD	N	N
VBM	PIN	107237819	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	TYLMAN JR, FRANK J		N	N
VBM	PIN	107237457	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	REP	TYLMAN, VICTORIA F	VTYLMAN@	N	N
VBM	PIN	105286528	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	ULIASZ JR, JAMES J	SWAMPFAI	N	N
VBM	PIN	106971389	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	UNDESTAD, JEFFREY K		N	N
VBM	PIN	126736724	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	VALDES, LUIS C		N	N
VBM	PIN	109249090	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	VALERO, ADOLFO	valeroadol	N	N
VBM	PIN	106896384	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	VAN HORN, DIANE		N	N
VBM	PIN	107422869	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	VANDERBILT, JOEY LP		N	N
VBM	PIN	107422868	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	VANDERBILT, LISA M		N	N
VBM	PIN	114796489	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	VANOOSTING BOLLMAN, E	EVANOOS	N	N
VBM	PIN	107205929	43887	45524	2024	Prima	8/9/2024	V	6/23/2024	7/16/2024	8/9/2024	N	N	N	NPA	VASALLO, ADAM L	ADAM.VAS	N	N
VBM	PIN	106839160	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	VASALLO, JOSE L	JVASALLOS	N	N
VBM	PIN	106773381	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	DEM	VASALLO, SUSAN R	JVASALLOS	N	N
VBM	PIN	106979243	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	VENERO, PETER V		N	N
VBM	PIN	106838595	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	VIERA, KIMBERLY D		N	N
VBM	PIN	106847006	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	VIERA, MARION K		N	N
VBM	PIN	107320101	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	VITIELLO, JEANETTE D	anjvitiello@	N	N
VBM	PIN	106816528	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	REP	VOZZA, PHILIP P	PVOZZA12	N	N
VBM	PIN	107064935	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	WALKER JR, DAVID L	PARROTHE	N	N
VBM	PIN	112913028	43887	45524	2024	Prima	8/11/2024	P	6/23/2024	7/16/2024		N	N	N	REP	WALKER, CHRISTINA L	cl.kimball@	N	N
VBM	PIN	118934005	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	REP	WALKER, KELLI J	KELLIGIRL	N	N
VBM	PIN	106975670	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	WALKER, NANCY F		N	N
VBM	PIN	107293476	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	DEM	WALKER, WANDA F	MOMPOOK	N	N
VBM	PIN	106876673	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	WALSH, EILEEN S	SEWME92	N	N
VBM	PIN	107361766	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	WALSH, KATHERINE J	WALSH.KA	N	N
VBM	PIN	106740422	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	REP	WALSH, MICHAEL J		N	N
VBM	PIN	115539783	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	WALSH, SHAWN M		N	N
VBM	PIN	106987229	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	WALTERS-COLE, HEATHER	HEATHERV	N	N
VBM	PIN	105129498	43887	45524	2024	Prima	8/10/2024	V	6/23/2024	7/16/2024	8/10/2024	N	N	N	REP	WARRICK, JUDY K	UNSHAKE/	N	N
VBM	PIN	106878268	43887	45524	2024	Prima	7/25/2024	V	6/23/2024	7/16/2024	7/25/2024	N	N	N	REP	WATERS-BORLAND, SHEILA	SHEILA-60	N	N
VBM	PIN	106775125	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	WATKINS, SUNDRA L	TERRYW4@	N	N
VBM	PIN	107018062	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	WATKINS, TERRY W	TERRYW4@	N	N
VBM	PIN	106847726	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	WAYNE, DIANE M	jeffkentuck	N	N
VBM	PIN	106861711	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	WAYNE, JEFFREY M	jeffkentuck	N	N
VBM	PIN	107100320	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	WEAN, GAIL L		N	N
VBM	PIN	106928593	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	WEBB, CHRISTOPHER E	CHRISWEE	N	N
VBM	PIN	107032753	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	WEBB, LYNN A	WEBBSYGI	N	N
VBM	PIN	107142116	43887	45524	2024	Prima	8/8/2024	V	6/23/2024	7/16/2024	8/8/2024	N	N	N	REP	WEBB, VICKI W	VICKIWEBI	N	N
VBM	PIN	106961111	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	WEIDEMANN, PAUL A		N	N
VBM	PIN	107315421	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	WEINBERG, RANDELL A		N	N
VBM	PIN	107052243	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	WEISBERG, ARI B	weisberg@	N	N
VBM	PIN	106709146	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	WEISKOPF, SHIRLEY E	SHIRLEYW	N	N
VBM	PIN	107287639	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	WELLS JR, GEORGE G		N	N
VBM	PIN	107317284	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	WENDLING JR, FREDERICK	VIP1270@(	N	N
VBM	PIN	106718166	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	WENTZ, JAMES C		N	N
VBM	PIN	106821591	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	WENTZ, LISA A	IMAGEIT@'	N	N
VBM	PIN	106873001	43887	45524	2024	Prima	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N	REP	WENTZ, LLOYD EB	HARLEYCF	N	N
VBM	PIN	106779277	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	REP	WERNER, ELIZABETH H	WERNER2(	N	N
VBM	PIN	106779276	43887	45524	2024	Prima	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N	DEM	WERNER, MICHAEL A	MAWEHW.	N	N
VBM	PIN	107212429	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	WESSLING, SHERYL A		N	N
VBM	PIN	106856962	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	WEST, JODY E	WESTJ91@	N	N
VBM	PIN	106894426	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	WEST, TOBI B		N	N
VBM	PIN	107133390	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/17/2024	8/16/2024	N	N	N	REP	WESTUBA, KRISTIN D		N	N
VBM	PIN	116713720	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	WHITTAKER, SHELBY D	SHELALE1	N	N
VBM	PIN	106880690	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	WIGGINS, BRYAN S		N	N

VBM	PIN	106960275	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	REP	WIGGINS, RACHELLE M		N	N
VBM	PIN	106621481	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	WIGHT, MELISSA A	MAWIGHT:	N	N
VBM	PIN	107362421	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	WIGHT, THOMAS M	TMWIGHT@	N	N
VBM	PIN	107407360	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	REP	WILCOX, KRISTI K		N	N
VBM	PIN	106603370	43887	45524	2024	Prima	8/2/2024	V	6/23/2024	7/16/2024	8/2/2024	N	N	N	DEM	WILFONG, CHRISTOPHER J	chrisjwilfor	N	N
VBM	PIN	106935054	43887	45524	2024	Prima	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N	REP	WILLIAMS JR, BERT A		N	N
VBM	PIN	107180922	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	WILLIAMS SR, MARK A	MAW3339(	N	N
VBM	PIN	107417811	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	WILLIAMS, ELIZABETH B	blake603@	N	N
VBM	PIN	106896493	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	WILLIAMS, ERIC D	EWILL17@	N	N
VBM	PIN	106880204	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	WILLIAMS, KETURAH L	KLWILLIAM	N	N
VBM	PIN	107259290	43887	45524	2024	Prima	6/24/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	WILLIAMS, TONYA L	THEIRISHK	N	N
VBM	PIN	106766706	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	DEM	WILLIAMS, WILL E	WILLIAMS:	N	N
VBM	PIN	122916514	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	DEM	WILLIS, JENNIFER J	JENNOLES	N	N
VBM	PIN	129595578	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	WILLMES, AUSTIN J	awbasebal	N	N
VBM	PIN	129595570	43887	45524	2024	Prima	8/14/2024	V	6/23/2024	7/16/2024	8/14/2024	N	N	N	REP	WILLMES, RACHEL G	rgwillmes@	N	N
VBM	PIN	107301160	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	WILSON, ANDREW S		N	N
VBM	PIN	107300454	43887	45524	2024	Prima	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N	REP	WILSON, CINDY M		N	N
VBM	PIN	106789840	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	WILSON, DONALD S	dwilson14(	N	N
VBM	PIN	106819620	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	WILSON, GLENN A	gwilson10:	N	N
VBM	PIN	106945766	43887	45524	2024	Prima	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N	IND	WILSON, ROBINETTE	robinette.v	N	N
VBM	PIN	107393273	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	WIRTH, DAVID A	DAVID.A.W	N	N
VBM	PIN	106866253	43887	45524	2024	Prima	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	N	N	N	REP	WISSE, DENISE B	DENEBRO\	N	N
VBM	PIN	106897509	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	WISSE, GERALD J		N	N
VBM	PIN	126947416	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	DEM	WIXTED, MICHAEL W	now_in_mi	N	N
VBM	PIN	110439928	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	WOSTER, JUDITH A		N	N
VBM	PIN	102716403	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	REP	WYLLIE, DAVID M	WYLLIEDA'	N	N
VBM	PIN	111063694	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	DEM	YARBOROUGH JR, JOSEPH	jseal@aol.(	N	N
VBM	PIN	111063700	43887	45524	2024	Prima	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	REP	YARBOROUGH, KRISTINE E	KYARB1@A	N	N
VBM	PIN	106919160	43887	45524	2024	Prima	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N	REP	YARBROUGH, PETER A		N	N
VBM	PIN	113442774	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N	REP	YOUNG JR, WILLIAM T	THAWK001	N	N
VBM	PIN	120291318	43887	45524	2024	Prima	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N	REP	ZAMBONI, KATHARINE M	kate.zambo	N	N
VBM	PIN	120291345	43887	45524	2024	Prima	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N	NPA	ZAMBONI, NORMAN R	normzamb	N	N
VBM	PIN	116161425	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	REP	ZARATE, ANTHONY R	AR.ZARATE	N	N
VBM	PIN	107411904	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	DEM	ZAVALA, PAMELA	PAMELAZA	N	N
VBM	PIN	122834927	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	NPA	ZAWISTOWSKI, JASON A		N	N
VBM	PIN	107011956	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	ZAWISTOWSKI, LISA M		N	N
VBM	PIN	107009005	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	DEM	ZAWISTOWSKI, RONALD E	ron@idsfl.(	N	N
VBM	PIN	121578207	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	ZERO, GUY M		N	N
VBM	PIN	110948453	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	ZITO, JOHN A	JZITO1@TA	N	N
VBM	PIN	110945149	43887	45524	2024	Prima	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	REP	ZITO, SUSAN L	DRS.ZITO@	N	N
VBM	PIN	106946532	43887	45524	2024	Prima	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	REP	ZITZELBERG, RUSSELL A	OMEGA21:	N	N
VBM	PIN	107024834	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	ZLOTO, JAMES W	JZLOTO@T	N	N
VBM	PIN	107043364	43887	45524	2024	Prima	8/16/2024	V	6/23/2024	7/16/2024	8/16/2024	N	N	N	REP	ZLOTO, MARGARET J	zloto-edu@	N	N
VBM	PIN	124462723	43887	45524	2024	Prima	8/19/2024	V	6/23/2024	7/17/2024	8/19/2024	N	N	N	NPA	ZSIGA, JESSALYN J	jjzsiga@yal	N	N
VBM	PIN	107204168	43887	45524	2024	Prima	6/25/2024	P	6/23/2024	7/16/2024		N	N	N	NPA	ZULAUF, STEPHEN S		N	N

EXHIBIT B

Protected Voter Web Block

EXHIBIT B: Protected Voter Web Block

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Google Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Protected Voter Message

Select Language

Powered by Google Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Last Name:

EXHIBIT X

Muscarella VBM Log Entry – June 23, 2024

EXHIBIT X – MUSCARELLA VBM LOG ENTRY

SHOWING SUNDAY JUNE 23, 2024 REQUEST DATE – IMPOSSIBLE FOR PROTECTED VOTER

Recor	Coun	VoterIdNumber	ElectionNı	ElectionDa	ElectionN.	LastRecorc	Vot	RequesteDate	Delivery Date	BallotRetu	Re	Mil	Ov	Mil	Prec	PrecinctS	Congressi	SenateDis	HouseDist	CountyCo	SchoolBoa	OtherDistr	Party	Voter Name	MailingAddressLine 1	MailingAd	MailingAd	MailingAddress City	Mai	Mailing	Ma	E-mailAd	Fa	De	Do	VoterFLDL/StateID	VoterSSN4
VBM	PIN	111191787	43887	45524	2024 Prim	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N										REP	KAHN, JARED D							jaredkah				N	N
VBM	PIN	107265658	43887	45524	2024 Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N										DEM	VICARI, BRANDEN M							BVICARI1				N	N
VBM	PIN	107344808	43887	45524	2024 Prim	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N	135		135	14	16	60	7	7	CCA,3 | CT	DEM	KLEIN, JEFFREY N	606 12TH AVE NE #4			ST PETERSBURG	FL	33701		klein76@				N	N
VBM	PIN	106876672	43887	45524	2024 Prim	8/13/2024	V	6/23/2024	7/16/2024	8/13/2024	Y	N	Y										NPA	COLEMAN, SHERWOOD S											N	N
VBM	PIN	107374929	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N										REP	CROFF, DIANE M											N	N
VBM	PIN	111215604	43887	45524	2024 Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N										REP	DITTMER, ROBERT G							ROBDITTI				N	N
VBM	PIN	107149377	43887	45524	2024 Prim	8/11/2024	P	6/23/2024	7/16/2024		N	N	N										REP	DUBBELD, JENNIFER C							DUBB80(				N	N
VBM	PIN	106986554	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										REP	FEDERICO, PHILIP J											N	N
VBM	PIN	107285314	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	GNAGE, BRIAN E							bgnage@				N	N
VBM	PIN	106995645	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	GRISSINGER, HOLLY T							grissinge				N	N
VBM	PIN	107366706	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										NPA	JACK, ELIZABETH M											N	N
VBM	PIN	106993896	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										NPA	KELLY, LORRAINE M							LORRAIN				N	N
VBM	PIN	106723453	43887	45524	2024 Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N										REP	KHOUZAM, NELLY N											N	N
VBM	PIN	107338189	43887	45524	2024 Prim	7/22/2024	V	6/23/2024	7/16/2024	7/22/2024	N	N	N										REP	LOAR, DONEENE D							DONEEN				N	N
VBM	PIN	107285166	43887	45524	2024 Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N										DEM	LUCAS, CHERYL L							CHERYLL				N	N
VBM	PIN	107150747	43887	45524	2024 Prim	8/19/2024	V	6/23/2024	7/16/2024	8/19/2024	N	N	N										NPA	MASTERSON, VICKI A							lmkiki@l				N	N
VBM	PIN	107385240	43887	45524	2024 Prim	7/24/2024	V	6/23/2024	7/16/2024	7/24/2024	N	N	N										REP	MATTHEY, PHILIPPE											N	N
VBM	PIN	106958587	43887	45524	2024 Prim	7/29/2024	V	6/23/2024	7/16/2024	7/29/2024	N	N	N										DEM	MOORE, PATRICE W							pwmoore				N	N
VBM	PIN	106784723	43887	45524	2024 Prim	7/26/2024	V	6/23/2024	7/16/2024	7/26/2024	N	N	N										REP	MUSCARELLA, PATRICIA A							tmuscarc				N	N
VBM	PIN	107071107	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N										REP	NEWTON, CYNTHIA J											N	N
VBM	PIN	100554220	43887	45524	2024 Prim	8/10/2024	P	6/23/2024	7/16/2024		N	N	N										REP	PEARLMAN, NICOLE M							NPEARLM				N	N
VBM	PIN	106815101	43887	45524	2024 Prim	8/7/2024	V	6/23/2024	7/16/2024	8/7/2024	N	N	N										REP	PIERCE, JAMES V							jamesvin				N	N
VBM	PIN	107171797	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										DEM	RAMSBERGER, ANGELA M							ANGRAM				N	N
VBM	PIN	107143704	43887	45524	2024 Prim	8/12/2024	V	6/23/2024	7/16/2024	8/12/2024	N	N	N										NPA	RAMSBERGER, THOMAS M							TOMRAM				N	N
VBM	PIN	106991733	43887	45524	2024 Prim	8/5/2024	V	6/23/2024	7/16/2024	8/5/2024	N	N	N										REP	RIBA, JOSHUA B							JRIBA01(				N	N
VBM	PIN	106869196	43887	45524	2024 Prim	8/18/2024	V	6/23/2024	7/16/2024	8/18/2024	N	N	N										NPA	SILBERMAN, MORRIS											N	N
VBM	PIN	107328087	43887	45524	2024 Prim	8/17/2024	V	6/23/2024	7/16/2024	8/17/2024	N	N	N										NPA	ST JOHN, SUSAN											N	N
VBM	PIN	106750878	43887	45524	2024 Prim	6/25/2024	P	6/23/2024	7/16/2024		N	N	N										REP	STEARNS, JAMES R							astearns(				N	N
VBM	PIN	106869683	43887	45524	2024 Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N										REP	TODD, KIMBERLY P							KIMPH@I				N	N
VBM	PIN	113787369	43887	45524	2024 Prim	8/15/2024	V	6/23/2024	7/16/2024	8/15/2024	N	N	N										NPA	VILLANTI, CRAIG C							CCVILLAI				N	N
VBM	PIN	106972664	43887	45524	2024 Prim	7/31/2024	V	6/23/2024	7/16/2024	7/31/2024	N	N	N										REP	WESTINE, LAURALEE G							lwestine(				N	N
VBM	PIN	106715884	43887	45524	2024 Prim	6/24/2024	P	6/23/2024	7/16/2024		N	N	N										REP	WILLIAMS, AMY M											N	N
VBM	PIN	106772419	43887	45524	2024 Prim	8/1/2024	V	6/23/2024	7/16/2024	8/1/2024	N	N	N	632		632	13	21	57	4	4	CCA,1 | FC	REP	SIRACUSA, PAT	1802 HIGHLAND CLUB LN			PALM HARBOR	FL	34684		PATSIRA(				N	N
VBM	PIN	107203935	43887	45524	2024 Prim	8/20/2024	V	6/23/2024	7/16/2024	8/20/2024	N	N	N	420		420.1	13	18	58	5	5	CCA,2 | CT	NPA	FRAYMAN, EVAN G	2000 BEACH TRL #4			INDIAN ROCKS BEACH	FL	33785		efraymar				N	N

Impossible Date For Protected Voter

Patricia A. Muscarella
A protected voter

NO ID VERIFICATION

EXHIBIT Y

Screenshot of Online Request Denial Message

EXHIBIT Y – SCREENSHOT OF ONLINE REQUEST DENIAL MESSAGE

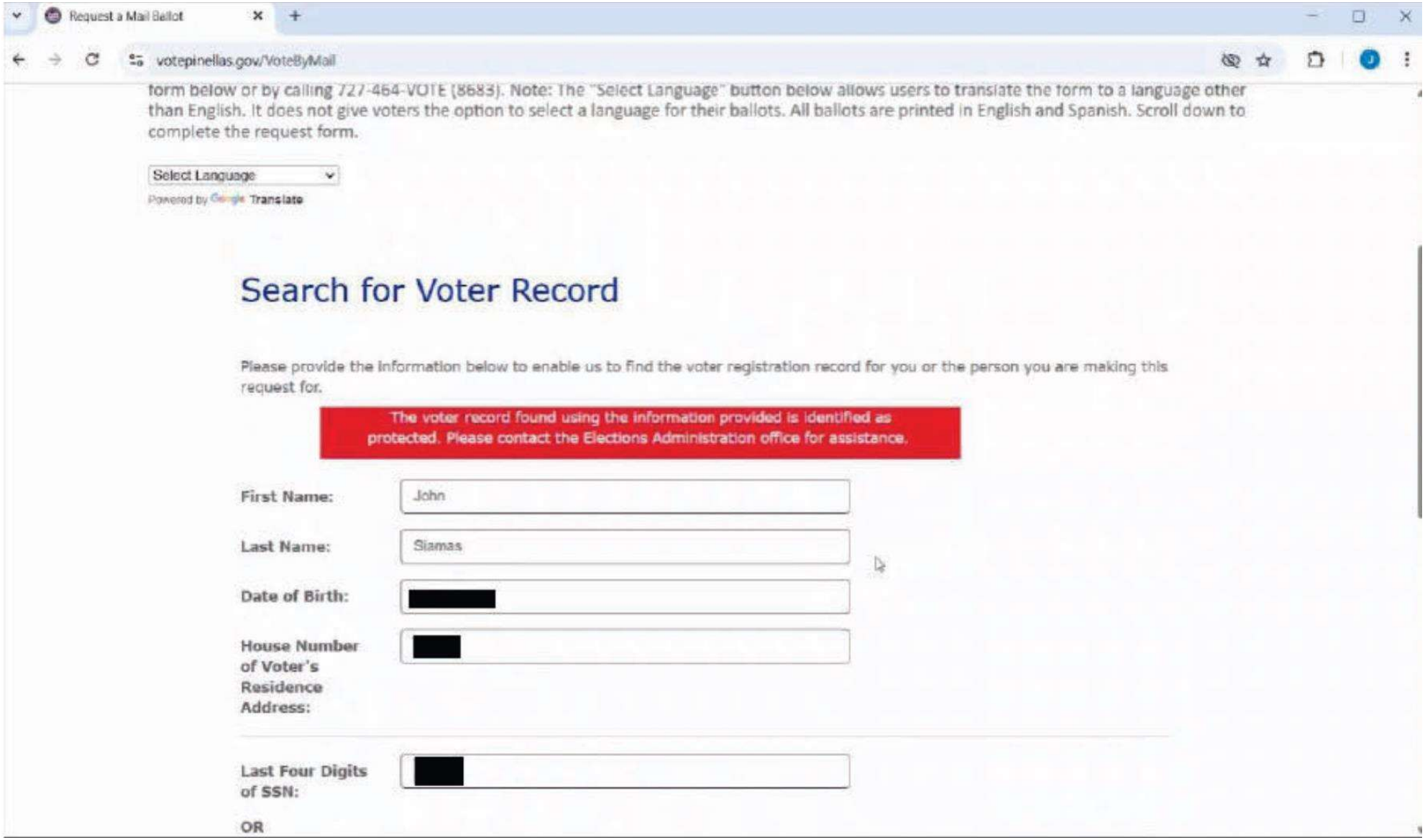

Request a Mail Ballot
votepinellas.gov/VoteByMail
form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Search for Voter Record
Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.
The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.
First Name:
John
Last Name:
Siamas
Date of Birth:
House Number of Voter's Residence Address:
Last Four Digits of SSN:
OR

EXHIBIT Z

Affidavit of John Siamas – Protected Voter Access Denied (4/28/25)

AFFIDAVIT OF JOHN SIAMASDETAILING THE EVENTS OF REQUESTING A VOTE-BY-MAIL-BALLOT AS A PROTECTED VOTER

STATE OF FLORIDA)

) ss:

COUNTY OF PINELLAS)

Before me, the undersigned authority, personally appeared JOHN SIAMAS, who, being duly sworn, states as follows:

AFFIANT IDENTITY

1. I, John Siamas, was a Republican candidate for the Florida State Sente District 21 Primary Election held on August 20th, 2024. I am over 18 and competent to make this affidavit and have personal knowledge of the facts stated herein.

PURPOSE OF AFFIDAVIT

2. This affidavit is made to establish the process I underwent requesting a Mail Ballot from the Pinellas County Supervisor of Elections as a "Protected Voter" on April 11, 2025 at 12:17 p.m.

MAIL BALLOT REQUEST FROM THE PINELLAS COUNTY SUPERVISOR OF ELECTIONS OFFICE

3. On April 11, 2025, at 12:17 p.m., I accessed the Pinellas County Supervisor of Elections website (*votepinellas.gov*) to request a mail ballot. I took screenshots of the entire process and have included them as **Exhibit 1**.

4. After entering all the requested information, I received a message which stated "The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

5. I then proceeded to call the Supervisor of Elections in Pinellas County as instructed in the message I received, at 12:20 p.m.

6. I spoke with a Supervisor of Elections Representative who stated that protected voters cannot request their Mail Ballot online. He then stated he could process my Mail Ballor request over the phone and proceeded to request some information in order to process the Mail Ballot request.

7. The information requested included my name, address, date of birth, and the last 4 of my SSN. I was not instructed to fill out any forms or provide any additional details to process the Mail Ballot request. I transcribed the full conversation with the Supervisor of Election Representative I had on April 11, 2025 (see **Exhibit 2**).

4. All of the records attached to this affidavit are true and correct copies of documents created at or near the time of the described events.

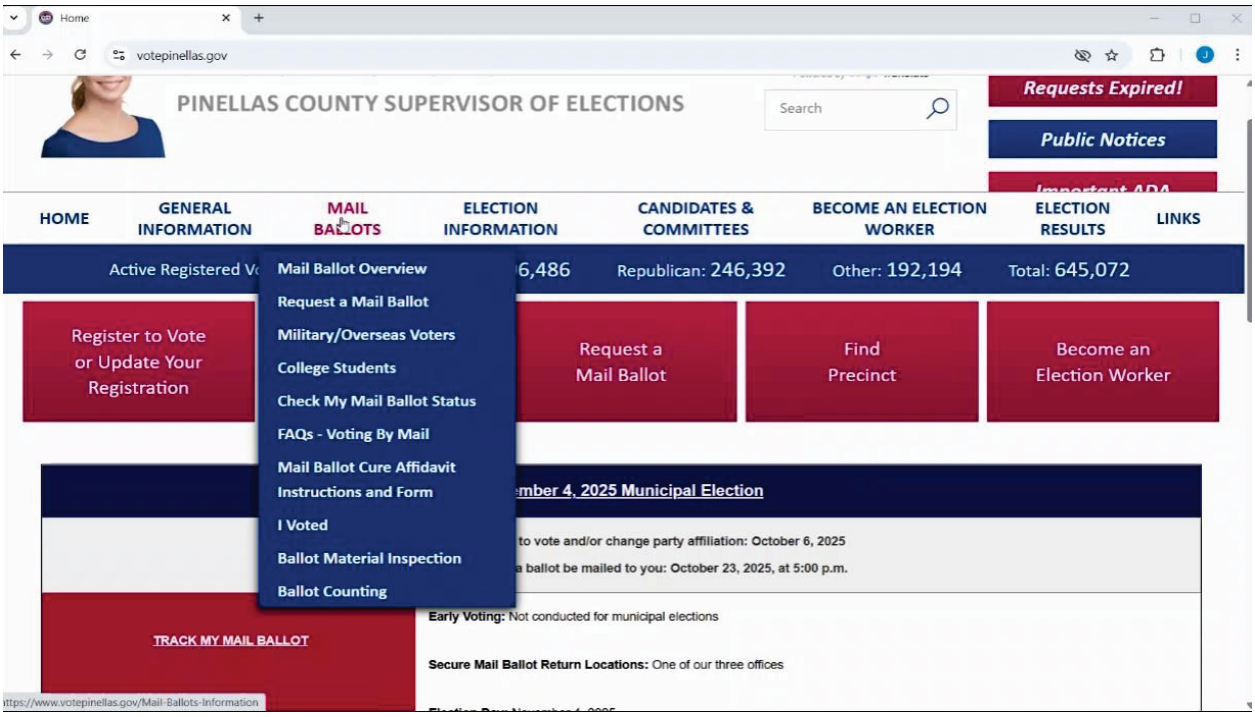
LIST OF EXHIBITS

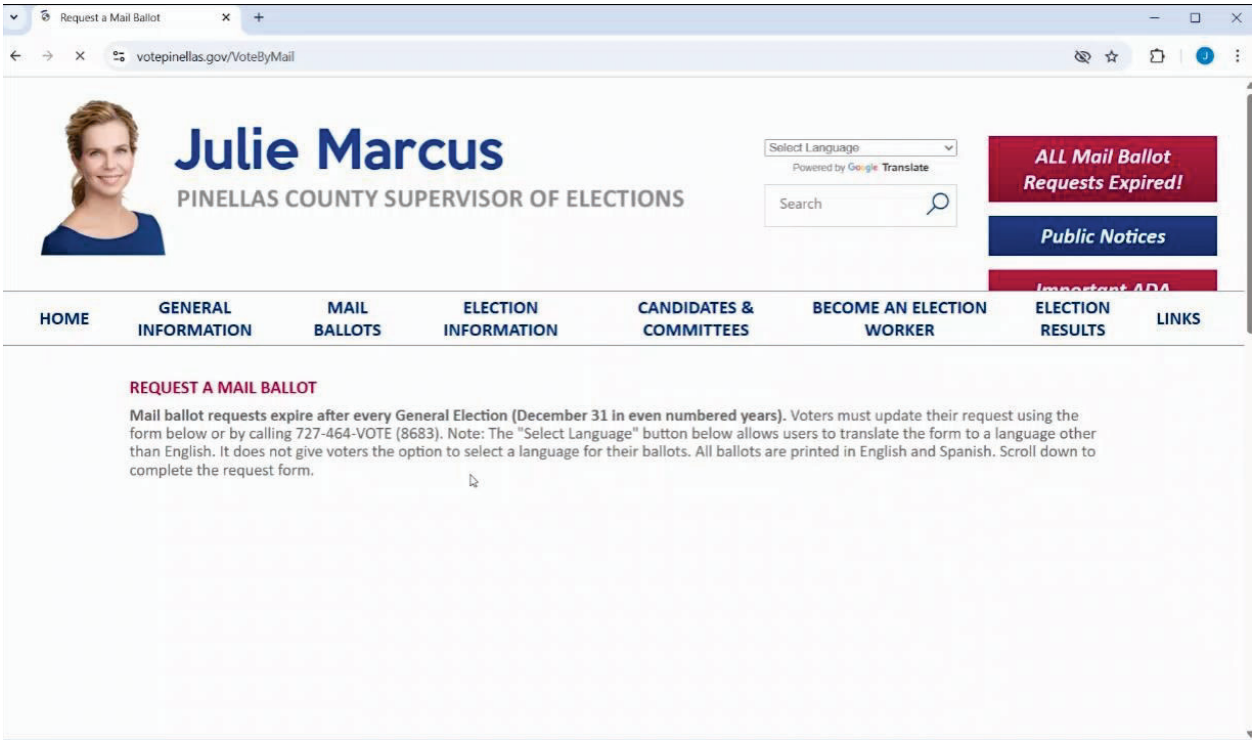
1. **Exhibit 1**: Screenshots of online Mail Ballot Request from the website of the Pinellas County Supervisor of Election website, *votepinellas.gov.*

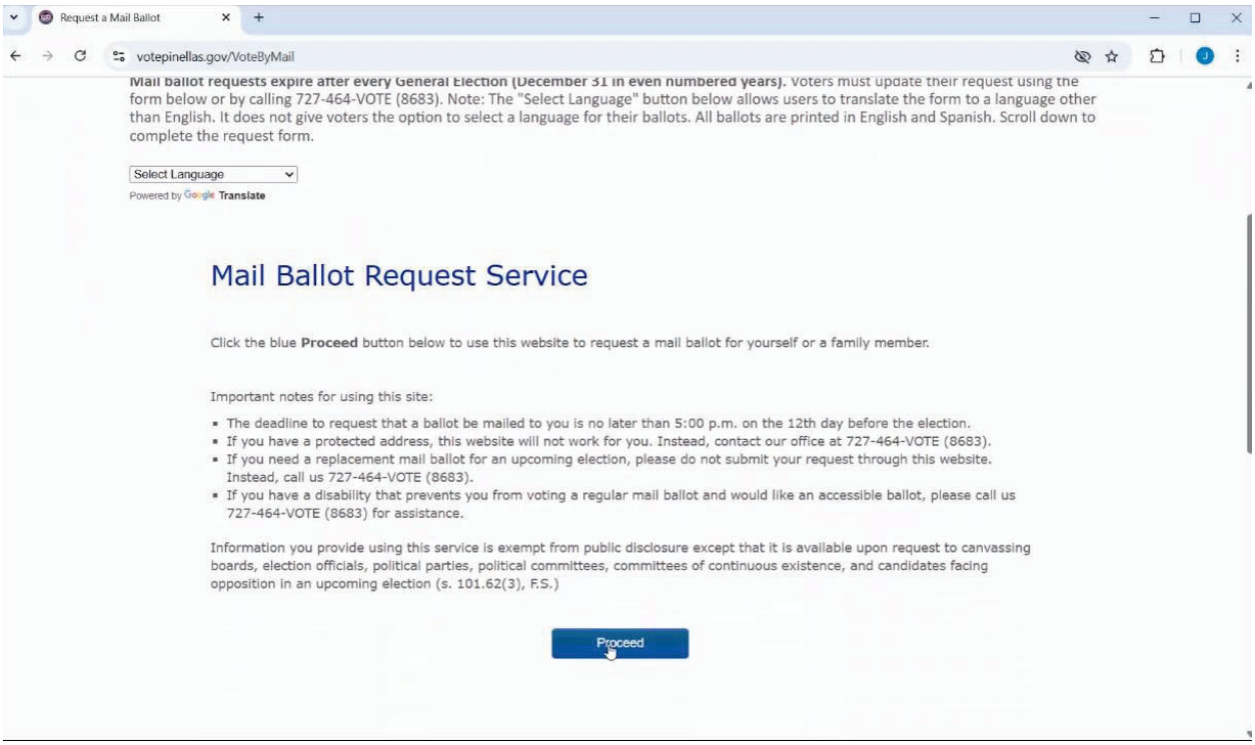
2. **Exhibit 2**: Transcription of Conversation with the Pinellas County Supervisor of Election Representative requesting a Mail Ballot on April 11, 2025, 12:20 p.m.

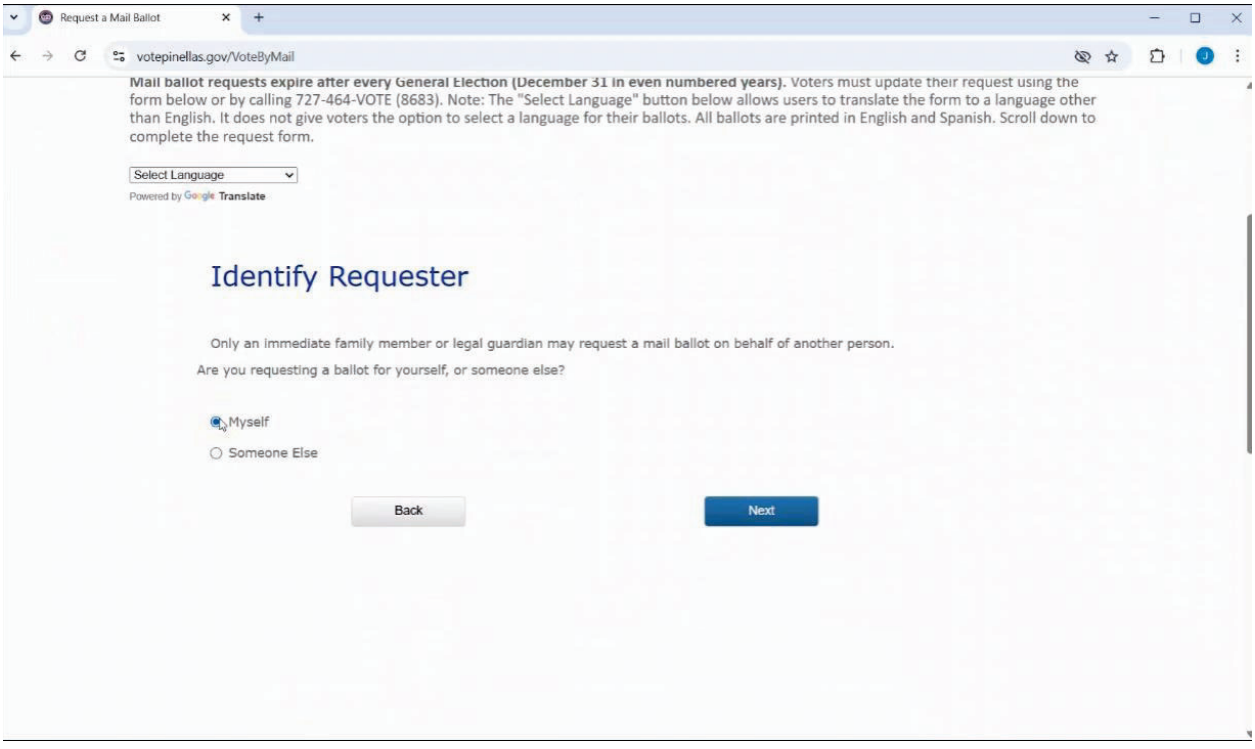
Exhibit 1

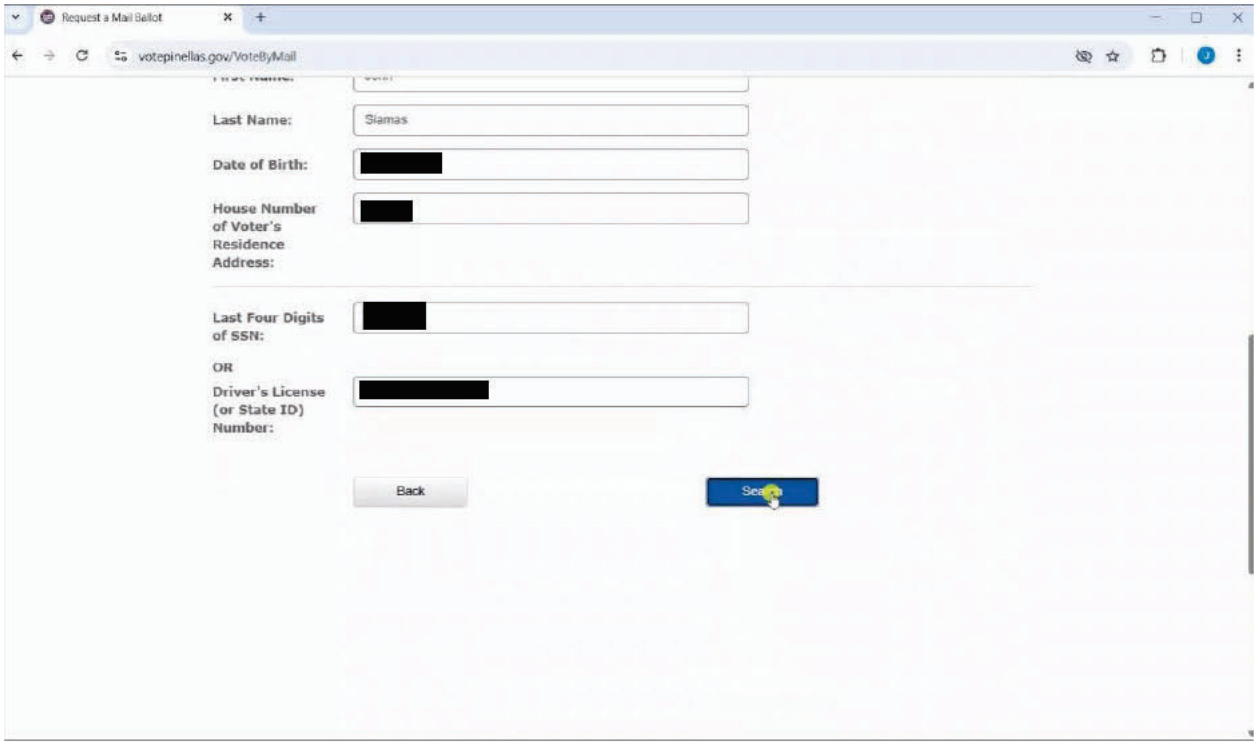
Screenshots of online Mail Ballot Request from the website of the Pinellas County Supervisor of Election website, *votepinellas.gov.*




votepinellas.gov/VoteByMail
Julie Marcus
PINELLAS COUNTY SUPERVISOR OF ELECTIONS
Select Language
Powered by Google Translate
Search
ALL Mail Ballot Requests Expired!
Public Notices
HOME
GENERAL INFORMATION
MAIL BALLOTS
ELECTION INFORMATION
CANDIDATES & COMMITTEES
BECOME AN ELECTION WORKER
ELECTION RESULTS
LINKS
REQUEST A MAIL BALLOT
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.


Request a Mail Ballot
votepinellas.gov/VoteByMail
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Mail Ballot Request Service
Click the blue Proceed button below to use this website to request a mail ballot for yourself or a family member.
Important notes for using this site:
The deadline to request that a ballot be mailed to you is no later than 5:00 p.m. on the 12th day before the election.
If you have a protected address, this website will not work for you. Instead, contact our office at 727-464-VOTE (8683).
If you need a replacement mail ballot for an upcoming election, please do not submit your request through this website. Instead, call us 727-464-VOTE (8683).
If you have a disability that prevents you from voting a regular mail ballot and would like an accessible ballot, please call us 727-464-VOTE (8683) for assistance.
Information you provide using this service is exempt from public disclosure except that it is available upon request to canvassing boards, election officials, political parties, political committees, committees of continuous existence, and candidates facing opposition in an upcoming election (s. 101.62(3), F.S.)
Proceed


Request a Mail Ballot
votepinellas.gov/VoteByMail
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Identify Requester
Only an immediate family member or legal guardian may request a mail ballot on behalf of another person.
Are you requesting a ballot for yourself, or someone else?
Myself
Someone Else
Back
Next


Request a Mail Ballot
votepinellas.gov/VoteByMail
Last Name:
Siamas
Date of Birth:
House Number of Voter's Residence Address:
Last Four Digits of SSN:
OR
Driver's License (or State ID) Number:
Back

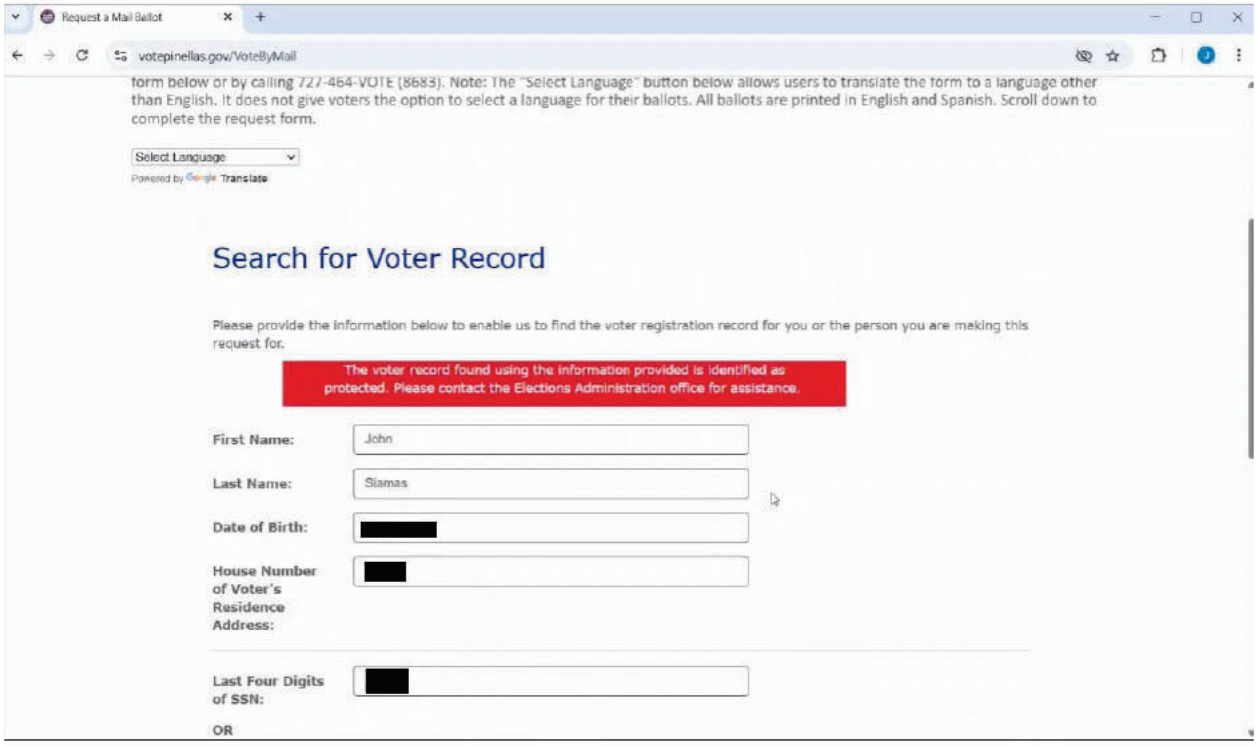

Request a Mail Ballot
votepinellas.gov/VoteByMail
form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Search for Voter Record
Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.
The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.
First Name:
John
Last Name:
Siamas
Date of Birth:
House Number of Voter's Residence Address:
Last Four Digits of SSN:
OR

Exhibit 2

Transcription of Conversation with the Pinellas County Supervisor of Election Representative requesting a Mail Ballot on April 11, 2025, 12:20 p.m.

Siamas: Hi good morning, I just tried to apply for my mail ballot, and I guess, not I guess I'm protected so there was a message that said I need to contact the elections administration office for assistance.

Supervisor of Elections Representative: Yea so if it's protected it's not going to allow, I'll do it over the phone.

Siamas: Oh ok so is that what happens, I can't do it online anymore because it's protected?

Supervisor of Elections Representative: Um yea I mean I've found that, I don't know how long it's been like that but yea you call in cause it's a protected address.

Siamas: Ok I'm just curious because I just recently became, You know I just recently submitted my paperwork to.

Supervisor of Elections Representative: Yea so we can do it over the phone.

Siamas: Ok is that cause it said elections administration office, I got a little confused I didn't know whether that is your office or another office.

Supervisor of Elections Representative: Yea it's the Supervisor of Elections Office.

Siamas: Ok, ok fantastic, yea just let me know what's next, I'm sorry.

Supervisor of Elections Representative: I just need your, just need your last name and your date of birth to get started.

Siamas: Ok so it's S-I-A-M-A-S.

Supervisor of Elections Representative: What's your date of birth?

Siamas: [redacted]

Supervisor of Elections Representative: Ok just give me a second.

Siamas: Actually this might apply to my spouse as well I'm assuming right? Because she, they would be included so, she hasn't tried yet but um, but I guess it would be the same process right?

Supervisor of Elections Representative: Um yes it's protected. Last four of

your social to verify the record please.

Siamas: Sure [redacted]

Supervisor of Elections Representative: Ok, and verify your address please.

Siamas: Yea its [redacted]

[redacted] Let me get my, do you need my driver's license?

Supervisor of Elections Representative: Uh, no Sir.

Siamas: Ok

Supervisor of Elections Representative: Give me a second here while I verify your record.

Siamas: Do you know why that is when you are protected, uh you gotta go through this process?

Supervisor of Elections Representative: I don't know why, I do know if somebody didn't have, you have one or the other you have your DL or the last four of your Social and you enter one or the other.

Siamas: Oh, I entered both is that why its coming up.

Supervisor of Elections Representative: No

Siamas: Oh ok ok, I thought I maybe screwed up when I was entering the data.

Supervisor of Elections Representative: Alright so, so your record is updated and it's good until December 31, 2026, so it's all this year and next year, um you are in a county not in a municipality so.

Siamas: Correct.

Supervisor of Elections Representative: So you have nothing scheduled for this year unless we have a special election then you will receive a mail ballot, other than that next year.

Siamas: Ok so I'm good to go when, um.

Supervisor of Elections Representative: You are good to go all the way to next year.

Siamas: So I'll get it in the mail right, I don't have to worry about that or

anything?

Supervisor of Elections Representative: Right, right you'll get it, if for some reason you don't, you can always call or go online to see the status of it.

Siamas: Oh, can I check the status?

Supervisor of Elections Representative: I don't know if you are protected, I don't have that answer.

Siamas: Ok got it, well I'll give it a shot after a couple days, after it gets into the system I guess, I didn't even know you can do that.

Supervisor of Elections Representative: Yea you can check your status, and if you pull that up during an election you can pull that up and it will tell you where your ballot is, when its been mailed, if its been counted, you know that whole process.

Siamas: Gotcha, ok yea I haven't even been in this ballot status thing, I didn't even know it exists to be honest with you, yea I don't expect it to be updated right away so um, I'll um, I'll take a look in.. This is interesting, not that I'm questioning it, I'm just, its interesting how it um, and it's good, I'm very happy that the protected has to go through a um different process.

Supervisor of Elections Representative: My guess is you can't pull up your information since it is protected, also if there is a record request it is protected so a third party could not get that information cause it is protected so that's the whole thing.

Siamas: ok, um fantastic, well thank you so much for your help I um really appreciate it

Supervisor of Elections Representative: Alright have a good

Siamas: Thank you bye bye.

[AFFIANT SIGNATURE]

Sworn to and subscribed before me by means of ✓ physical presence or _____ online notarization, this 28th day of April 2025, by JOHN SIAMAS.

Notary Public – State of Florida

Eliana Pimentel

ELIANA PIMENTEL
Notary Public - State of Florida
Commission # HH 496125
My Comm. Expires May 9, 2028

Personally Known _____ OR Produced Identification ✓

Type of Identification Produced: Drivers License

Filing # 207253493 E-Filed 09/19/2024 12:05:15 PM

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON,

Plaintiff,

vs. Case No. 24-003995-CI

JULIE MARCUS, et al

Defendant.

_____/

PLAINTIFF'S VERIFIED MOTION TO DISQUALIFY
JUDGE PATRICIA MUSCARELLA

COMES NOW, Plaintiff Christopher Gleason, pro se, and pursuant to Rule 2.330 of the Florida Rules of Judicial Administration, respectfully moves this Court to enter an order disqualifying the Honorable Judge Patricia Muscarella from presiding over the above-captioned matter, case pursuant to Rule 2.330 of the Florida Rules of Judicial Administration and in support thereof states as follows:

1. Introduction

This motion is filed in good faith based upon facts and circumstances that would lead a reasonable person to fear that they would not receive a fair and impartial hearing or trial if Judge Muscarella continues to preside over this case.

2. Background

ELECTRONICALLY FILED 09/19/2024 12:05:15 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Plaintiff has been engaged in litigation against the Pinellas County Supervisor of Elections concerning allegations of unlawful concealment, delay, and alteration of public records and election records including Election Summary Reports, Precinct Summary Reports, illegal requests for vote by mail ballots, ballots being illegally and fraudulently cast and the illegal administration and illegal certification of elections using voting systems with no valid or legal certification in violation of Florida's Public Records Laws, Florida Election Code, Federal Election Code and election transparency requirements. In Case No. 23-6698, Judge Muscarella's repeated failure to rule on critical motions—particularly motions for judicial notice and discovery—combined with her failure to address serious irrefutable claims of voter disenfranchisement through the omission of thousands of blank ballots, has resulted in a well-grounded fear that Judge Muscarella cannot provide an impartial and fair hearing. Plaintiff is once again representing himself as a pro se litigant, but the ongoing issues in the present case are compounded by new evidence that suggests the Pinellas County Supervisor of Elections engaged in similar misconduct during the administration of the 2010 judicial election of Judge Patricia Muscarella. These allegations create an additional, direct conflict of interest.

3. Legal Standard

Rule 2.330(d)(1) of the Florida Rules of Judicial Administration states that a judge should be disqualified when the party fears that they will not receive a fair trial or hearing because of specifically alleged facts. The fear must be objectively reasonable. Under Canon 2A of the Florida Code of Judicial Conduct, judges must act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary. Canon 3B(7) requires judges to rule on all matters promptly and fairly, which Judge Muscarella failed to do by not addressing critical motions in the prior case. Furthermore, Canon 3E(1) mandates recusal where a judge's

impartiality might reasonably be questioned. In this case, the combination of Judge Muscarella's prior failure to rule fairly on motions, her unfair treatment of a pro se litigant, and the direct conflict arising from the administration of her own 2010 election by the same Supervisor of Elections, clearly meets the legal standard for recusal. In Livingston v. State, 441 So. 2d 1083 (Fla. 1983), the Florida Supreme Court held that the test for judicial disqualification is whether a reasonably prudent person, knowing all the facts, would have a reasonable fear of not receiving a fair trial. Here, the totality of the circumstances, including the conflict involving Judge Muscarella's election and the pattern of her conduct in the prior case, fully supports recusal.

4. Facts Supporting Disqualification

The following facts, known to the undersigned, support a well-founded fear that the Judge is biased or prejudiced against the Plaintiff:

a. Plaintiff filed a motion for judicial notice, requesting the Court to acknowledge statutory requirements regarding the Supervisor of Elections' duties under Florida law, including the obligation to provide complete, unredacted and unaltered public records and official election records. Judge Muscarella failed to rule on this motion, depriving Plaintiff of the ability to have these fundamental legal points acknowledged by the Court.

b. In connection with Plaintiff's allegations of voter disenfranchisement through blank ballots and omissions in the election summary reports also known as the EL45A reports and the precinct level election reports also known as the EL30A reports, Plaintiff sought discovery to obtain critical evidence of the Supervisor of Elections' conduct. Judge Muscarella did not rule on the motion for discovery, effectively blocking Plaintiff from gathering evidence essential to proving his claims. This failure to allow full discovery was particularly prejudicial to Plaintiff,

who was acting pro se at the time and was disadvantaged in navigating complex procedural matters.

c. Plaintiff, previously a pro se litigant, was subject to unfair treatment during the earlier proceedings, in which Judge Muscarella failed to rule on essential motions and disregarded significant claims involving voter disenfranchisement and public records concealment and alteration by the Pinellas County Supervisor of Elections.

d. The Plaintiff, as a pro se litigant is bringing a contest of election challenge based on fraud, official misconduct, corrupt practices and further violations of the Florida Constitution, the United State Constitution, Florida Election Statutes, Federal Election Statutes, and now brings this motion in light of serious concerns regarding the administration of Judge Muscarella's own 2010 election by the Pinellas County Supervisor of Elections, implicating a conflict of interest.

e. Plaintiff filed a motion for judicial notice, requesting the Court to acknowledge statutory requirements regarding the Supervisor of Elections' duties under Florida law, including the obligation to provide complete, unredacted and unaltered public records and official election records. Judge Muscarella failed to rule on this motion, depriving Plaintiff of the ability to have these fundamental legal points acknowledged by the Court.

f. In connection with Plaintiff's allegations of voter disenfranchisement through blank ballots and omissions in the election summary reports also known as the EL45A reports and the precinct level election reports also known as the EL30A reports, Plaintiff sought discovery to obtain critical evidence of the Supervisor of Elections' conduct. Judge Muscarella did not rule on the motion for discovery, effectively blocking Plaintiff from gathering evidence essential to proving his claims. This failure to allow full discovery was particularly prejudicial to Plaintiff,

who was acting pro se at the time and was disadvantaged in navigating complex procedural matters.

g. During the previous proceeding, Plaintiff represented himself pro se and was subject to unfair treatment that further supports the reasonable belief that Judge Muscarella's handling of the case was biased. Courts have a duty to ensure pro se litigants receive fair treatment, yet Judge Muscarella's consistent failure to rule on key motions and to address substantive issues raised by Plaintiff, including substantial claims of voter disenfranchisement, demonstrates a lack of impartiality.

h. The Pinellas County Circuit Court's procedural delays and Judge Muscarella's refusal to allow discovery and take judicial notice effectively denied Plaintiff access to the evidence needed to substantiate his claims, while favoring the defense's arguments, including accepting without scrutiny the defense counsel's fraudulent misrepresentation regarding the statutory requirements for election reports. This unfair treatment of a pro se litigant raises serious ethical concerns under Florida's judicial canons.

i. Compounding these concerns is the fact that the issues being litigated in the current case involve similar allegations of unlawful election practices by the Supervisor of Elections that implicate the administration of the 2010 judicial election of Judge Patricia Muscarella. Plaintiff has obtained evidence indicating that the same practices involving the concealment of public records, the unlawful administration of elections using electronic voting systems that have modems attached voiding their certification and the failure to properly report voter data—including blank ballots, and vote by mail fraud—were employed during the election in which Judge Muscarella was elected.

j. This creates an inherent conflict of interest, as Judge Muscarella's impartiality is now in question, given that the allegations in this case directly relate to the actions of the Pinellas County Supervisor of Elections in administering her own election. A reasonable person, aware of these facts, would have a well-founded fear that Judge Muscarella cannot be impartial in ruling on a case that involves misconduct by the very office that oversaw her election.

5. Fear of Bias

Based on these facts, the undersigned genuinely fears that they will not receive a fair and impartial hearing or trial due to the judge's actions, statements, or relationships.

6. Timeliness

This motion is filed timely and within ten (10) days of discovering the facts that give rise to the fear of prejudice. Under Rule 2.330(e), the motion must be filed immediately upon discovery of the grounds for disqualification.

7. Relief Requested

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court:

1. Enter an order disqualifying the Honorable Judge Patricia Muscarella from presiding over any further proceedings in this case.

2. Reassign this case to a different judge as provided under the rules governing the Sixth Judicial Circuit in Florida.

VERIFICATION

I, Christopher Gleason, hereby verify that the facts stated in this motion are true and correct to the best of my knowledge and belief.

Respectfully submitted,

/s/ Christopher Gleason

Christopher Gleason

1628 Sand Key Estates Court

Clearwater, FL 33767

727-480-2059

gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via email on this September 19, 2024 to: JARED N. KAHN, ESQ., Attorney for Defendant Julie Marcus,

in her official capacity as Pinellas County Supervisor of Elections, at jkahn@pinellas.gov and

eservice@pinellas.gov and to JEFFREY N. KLEIN, ESQ., Attorney for Defendant Pinellas

County Canvassing Board, at jklein@pinellas.gov and eservice@pinellas.gov.

JARED D. KAHN

Florida Bar Number 105276

Senior Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, Sixth Floor

Clearwater, FL 33756

Primary e-mail address: jkahn@pinellas.gov

Secondary e-mail address: eservice@pinellas.gov

Attorney for Julie Marcus, in her official capacity as

Pinellas County Supervisor of Elections

JEFFREY N. KLEIN
Florida Bar Number 1025117
Assistant County Attorney
Pinellas County Attorney's Office
315 Court Street, 6th Floor.
Clearwater, FL 33756
Tel: 727-464-3354/Fax: 727-464-4147
Primary e-mail address: jklein@pinellas.gov
Secondary e-mail address: eservice@pinellas.gov
Attorney for Defendant, Attorney for the Pinellas
County Canvassing Board

/s/ Christopher Gleason

Dated: 09/19/2024

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON,

Plaintiff,

vs. **Case No.: 24-003995-CI**

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et. al.,

Defendants.
_____/

ORDER DENYING PLAINTIFF'S RENEWED MOTION FOR RECUSAL/DISQUALIFICATION OF JUDGE PATRICIA MUSCARELLA PURSUANT TO SECTION 38.10, FLORIDA STATUTES

THIS MATTER is before the Court on Plaintiff's Renewed Motion for Recusal/Disqualification of Judge Patricia Muscarella Pursuant to Section 38.10, Florida Statutes ("Motion") dated October 21, 2024. Having considered the Motion, the case file, the applicable law, and being otherwise fully advised in the premises, the Court hereby

FINDS AND ORDERS:

The Motion is legally insufficient. *See* Fla. R. Gen. Prac. & Jud. Admin. 2.330(d).

Accordingly, it is

ORDERED AND ADJUDGED that Plaintiff's Motion is **DENIED.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 22nd day of October 2024. A true and correct copy of the foregoing has been furnished to the parties listed below.

24-003995-CI 10/22/2024 11:08:08 AM
Circuit Judge Patricia A. Muscarella
~~24-003995-CI 10/22/2024 11:08:08 AM~~
Honorable Patricia A. Muscarella
Circuit Civil Judge

ELECTRONICALLY FILED 10/22/2024 11:08:08 AM KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Copies furnished to:

Christopher Gleason
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gleasonforpinellas@gmail.com
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Counsel for Defendant, Julie Marcus

Jeffrey Klein Esq.
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jklein@pinellascounty.org
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Counsel for Defendant, Pinellas County Canvassing Board

Filing # 209218197 E-Filed 10/21/2024 02:16:32 PM

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON,

Plaintiff,

CASE NO.: 24-003995-CI
UCN: 522024CA003995XXCICI

v.

JULIE MARCUS, in her personal and official capacity as Pinellas County Supervisor of Elections; and the **CANVASSING BOARD OF PINELLAS COUNTY**,

Defendants.

_____/

PLAINTIFF'S RENEWED NOTICE AND MOTION FOR RECUSAL/DISQUALIFICATION OF JUDGE PATRICIA MUSCARELLA PURSUANT TO SECTION 38.10, FLORIDA STATUTES

COMES NOW the Plaintiff, Christopher Gleason, appearing pro se, and hereby moves this Honorable Court for the recusal/disqualification of Judge Patricia Muscarella from presiding over this case pursuant to Section 38.10, Florida Statutes, and Rule 2.330 of the Florida Rules of General Practice and Judicial Administration. In support of this Motion, Plaintiff submits the following:

I. LEGAL BASIS FOR RECUSAL/DISQUALIFICATION

ELECTRONICALLY FILED 10/21/2024 02:16:31 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

1. Section 38.10, Florida Statutes states:

> "Whenever a party makes and files an affidavit stating fear that the party will not receive a fair trial on account of the prejudice of the judge, the judge shall proceed no further, but another judge shall be designated."

- The statutory mandate is unequivocal. When a party's affidavit alleges fear of prejudice, and it is legally sufficient, the presiding judge must cease further proceedings and transfer the case to another judge. The standard for sufficiency is grounded not in proof of actual prejudice but in the appearance of potential bias.

2. Florida Rule of General Practice and Judicial Administration 2.330 dictates that:

- A motion for disqualification must be granted if a reasonably prudent person in the movant's position would fear not receiving a fair and impartial trial before the assigned judge. The motion and accompanying affidavit(s) need only be "legally sufficient," a standard satisfied when the motion sets forth facts that, if true, would place a reasonable person in fear of judicial bias.

II. FACTUAL BASIS SUPPORTING DISQUALIFICATION

3. Plaintiff's fear that Judge Muscarella is prejudiced is well-founded, substantiated by his own sworn affidavit and corroborated by sworn affidavits from five witnesses. These affidavits establish a consistent pattern of judicial conduct that demonstrates actual bias or, at minimum, the appearance thereof.

III. GROUNDS FOR DISQUALIFICATION

A. Repeated Failure to Rule on Critical Motions:

- Judge Muscarella has consistently failed to rule on Plaintiff's motions for judicial notice, discovery, and other critical motions necessary to the litigation of this case. Florida jurisprudence establishes that undue delay or failure to rule on motions constitutes a denial of due process. As held in *State ex rel. Davis v. Parks*, 141 So. 2d 638 (Fla. 1932), justice delayed is justice denied, and such delays cast doubt on the impartiality and efficiency of the judiciary.

B. Evidence of Conflict of Interest:

- Plaintiff has obtained evidence indicating that the Pinellas County Supervisor of Elections engaged in similar electoral improprieties during Judge Muscarella's 2010 judicial election. This creates an irrefutable conflict of interest. As noted in *State ex rel. Mickler v. Rowe*, 126 So. 2d 129 (Fla. 1960), a judge must recuse themselves when an appearance of bias or impropriety exists. The conflict is not merely hypothetical but grounded in Plaintiff's evidence, demonstrating Judge Muscarella's potential vested interest in protecting the Defendant.

C. Improper Reliance on Defense Counsel's Representations:

- On September 19, 2024, Judge Muscarella admitted unfamiliarity with relevant election law and sought guidance from defense counsel, Mr. Jared Kahn, on how to proceed. This reliance on defense counsel's guidance over Plaintiff's arguments contravenes the judicial duty of impartiality, as articulated in *The Florida Bar v. Cox*, 794 So. 2d 1278 (Fla. 2001). The impartial role of a judge requires independent evaluation of the law, not deferring to one party's counsel.

D. Acceptance of Misrepresentations Without Verification:

- Defense counsel falsely claimed that Exhibit G contained information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the information being widely accessible online. Judge Muscarella accepted this misrepresentation without requiring proof. In *Holloway v. State*, 342 So. 2d 966 (Fla. 1st DCA 1977), the court held that uncritically accepting one party's assertions is indicative of prejudice.

E. Disparate Treatment of Pro Se Litigant:

- The Florida judiciary recognizes the rights of pro se litigants to be treated fairly and ***equitably (Platel v. Maguire, Voorhis & Wells, P.A., 436 So. 2d 303 (Fla. 5th DCA 1983))***. Judge Muscarella's consistent deference to defense counsel and disregard for Plaintiff's arguments exhibits a clear bias against the Plaintiff as a self-represented litigant.

F. Prohibition on Recording Court Proceedings:

- Judge Muscarella's prohibition of recording court hearings is contrary to the principles of transparency mandated by ***In re Petition of Post-Newsweek Stations, Florida, Inc., 370 So. 2d 764 (Fla. 1979)***. The absence of any valid basis for this restriction raises concerns about transparency and impartiality.

G. Excessive Sealing of Exhibits:

- The Florida Constitution, Article I, Section 24, and Chapter 119 of the Florida Statutes emphasize transparency and open government. Judge Muscarella's order to seal all exhibits without using the least restrictive means violates Rule 2.420, Florida Rules of General Practice and Judicial Administration, and raises further concerns about her impartiality. As ruled in ***Barron v. Florida Freedom***

Newspapers, Inc., 531 So. 2d 113 (Fla. 1988), excessive secrecy is inimical to the public interest.

IV. AFFIDAVITS IN SUPPORT OF MOTION

4. Plaintiff's Affidavit is attached hereto, setting forth detailed facts substantiating the claim of bias and prejudice.

5. Affidavits of Five Witnesses are attached, corroborating Plaintiff's assertions of judicial bias and confirming specific incidents that exemplify Judge Muscarella's partiality.

- Each affidavit attests to observations of Judge Muscarella's statements, rulings, demeanor, and conduct that display a clear bias against Plaintiff, as well as her overt favoritism toward defense counsel, Mr. Jared Kahn.

V. LEGAL ANALYSIS

6. Florida courts have consistently upheld that a judge must be disqualified where there is an objectively reasonable fear of bias. The Plaintiff's allegations, supported by multiple sworn affidavits, provide ample grounds for such fear.

- ***In MacKenzie v. Super Kids Bargain Store, Inc., 565 So. 2d 1332 (Fla. 1990)***, the Florida Supreme Court reaffirmed that disqualification is appropriate where a party harbors a well-founded fear of not receiving a fair trial, even in the absence of proven actual bias.

- In ***Livingston v. State, 441 So. 2d 1083 (Fla. 1983)***, the Court held that the appearance of justice must be maintained, stating, "It is the very essence of a fair trial that the judge be impartial and that there be an appearance of impartiality."

VI. CONCLUSION

7. Based on the detailed facts and legal authorities presented, it is evident that Judge Patricia Muscarella's continued involvement in this case would undermine Plaintiff's constitutional right to a fair and impartial trial.

8. The facts, when viewed objectively, establish a reasonable fear of prejudice that warrants the immediate disqualification of Judge Muscarella under Section 38.10, Florida Statutes, and Rule 2.330 of the Florida Rules of General Practice and Judicial Administration.

WHEREFORE, Plaintiff respectfully requests that:

1. This Honorable Court GRANT Plaintiff's Motion for Recusal/Disqualification.

2. This matter be reassigned to another judge who can ensure the fair, impartial, and just adjudication of Plaintiff's claims.

CERTIFICATE OF GOOD FAITH

I, Christopher Gleason, certify that this motion is made in good faith and not for purposes of delay. The facts presented are true to the best of my knowledge and belief, and I genuinely fear that I will not receive a fair trial if Judge Muscarella continues to preside.

Respectfully submitted,

/s/ Christopher Gleason

Christopher Gleason

1628 Sand Key Estates Court

Clearwater, FL 33767

727-480-2059

gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via email on this October 1, 2024 to: JARED N. KAHN, ESQ., Attorney for Defendant Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections, Dustin Chase in his official capacity as the Deputy Supervisor of Elections and Matt Smith in his official capacity as General Counsel for the Pinellas County Supervisor of Elections, at jkahn@pinellas.govand eservice@pinellas.gov and to KELLY L. VICARI, Attorney for Defendant Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections, Dustin Chase in his official capacity as the Deputy Supervisor of Elections and Matt Smith in his official capacity as General Counsel for the Pinellas County Supervisor of Elections, at kvicari@pinellas.gov and eservice@pinellas.gov .

JARED D. KAHN

Florida Bar Number 105276

Senior Assistant County Attorney

Pinellas County Attorney's Office

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Secondary e-mail address: eservice@pinellas.gov

Attorney for Julie Marcus, in her official capacity as

Pinellas County Supervisor of Elections

KELLY L. VICARI

FBN: 88704

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Primary e-mail address: jklein@pinellas.gov

Secondary e-mail address: eservice@pinellas.gov

Attorney for Defendant, Attorney for the Pinellas

County Canvassing Board

/s/ Christopher Gleason

Dated: 09/23/2024

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON,

Plaintiff,

CASE NO.: 24-003995-CI
UCN: 522024CA003995XXCICI

v.

JULIE MARCUS, in her personal and official capacity as Pinellas County Supervisor of Elections; and the **CANVASSING BOARD OF PINELLAS COUNTY**,

Defendants.

AFFIDAVIT OF CHRISTOPHER GLEASON IN SUPPORT OF RENEWED MOTION FOR DISQUALIFICATION

STATE OF FLORIDA
COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared CHRISTOPHER GLEASON, who, being first duly sworn, deposes and states as follows:

1. My name is Christopher Gleason, and I am the Plaintiff in the above-captioned case currently pending before the Circuit Court of the Sixth Judicial Circuit in and for Pinellas County, Florida.

2. I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and belief.

3. I have a well-founded fear that I will not receive a fair trial in this case due to the demonstrated bias and prejudice of the presiding judge, the Honorable Judge Muscarella. This fear is reasonable and based on the following facts and circumstances:

A. Reliance on Defense Counsel's Misrepresentations

4. Throughout the proceeding, Judge Muscarella has consistently relied on the representations and arguments made by defense counsel, Mr. Jared Kahn, without independent verification or examination of the accuracy and legal validity of these statements.

5. Specifically, defense counsel misrepresented the legal status of Exhibit G by claiming that it contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d). Despite there being no valid basis or supporting evidence for such a claim, Judge Muscarella accepted these assertions without requiring defense counsel to provide proof or further clarification.

6. By adopting the defense counsel's misrepresentations, Judge Muscarella has shown a lack of impartiality and a predisposition to favor the defense's position, thereby undermining my confidence in her ability to preside over this case fairly and without bias.

B. Disregard for My Rights as a Pro Se Litigant

7. I am representing myself in this matter as a pro se litigant, which places me at a disadvantage compared to the represented defendants. It is my understanding that as a pro se litigant, I am entitled to the same fair treatment, consideration, and

protection of my rights as any other party appearing before the court, regardless of whether I have legal representation.

8. Despite this, Judge Muscarella has demonstrated a consistent pattern of favoring the defense's arguments and legal positions while disregarding or dismissing my legitimate legal arguments and evidence.

9. On multiple occasions, Judge Muscarella sought guidance and clarification from defense counsel regarding legal procedures and the interpretation of the law. This conduct suggests that Judge Muscarella is improperly relying on defense counsel's advice to guide the proceedings, rather than independently evaluating the issues and ensuring that both parties receive equal and fair treatment under the law.

10. The court's deference to defense counsel has created an imbalance in the proceedings and a well-founded fear that Judge Muscarella is not providing me, as a pro se litigant, the fair and impartial trial to which I am entitled under Florida law.

C. Unjustified Prohibition on Recording Court Proceedings

11. During the course of these proceeding, Judge Muscarella issued an order prohibiting the recording of court hearings, without providing any valid legal basis or compelling justification for such a restriction.

12. As a pro se litigant, I rely on the ability to record court proceedings to ensure that I have an accurate record of the hearings, which is essential for preserving my right to appeal or seek review of any adverse rulings. The prohibition on recording has significantly hindered my ability to protect my legal interests and maintain an accurate record of these proceedings.

13. The Florida Supreme Court has held that court proceedings should be open to the public and that recording should be permitted unless there is a compelling reason to restrict it ***(*In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979))***. Judge Muscarella's prohibition on recording, without a valid justification, raises concerns about transparency and suggests an attempt to limit public scrutiny, further contributing to my fear of bias.

D. Appearance of Impropriety and Bias

14. The Florida Supreme Court has made it clear that a judge should be disqualified if the facts create a reasonable fear that a party will not receive a fair trial ***(*MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990))***. The appearance of impropriety, partiality, or favoritism is sufficient grounds for recusal.

15. Based on the totality of the circumstances, including Judge Muscarella's reliance on defense counsel's guidance, disregard for my rights as a pro se litigant, and the unjustified prohibition on recording court proceedings, I have a well-founded fear that Judge Muscarella is biased and unable to preside over this case impartially.

16. Statement of Good Faith

16. I make this affidavit in good faith and not for the purpose of delay. I genuinely fear that I will not receive a fair and impartial trial if Judge Muscarella continues to preside over this case.

WHEREFORE, I respectfully request that Judge Muscarella be disqualified from this case pursuant to Section 38.10, Florida Statutes, and that this matter be reassigned to another judge who can ensure that I receive a fair and impartial trial.

FURTHER AFFIANT SAYETH NAUGHT.

Dated this 29 day of September, 2024

Christopher Gleason

Plaintiff

NOTARY ACKNOWLEDGMENT

STATE OF FLORIDA

COUNTY OF PINELLAS

SWORN TO and subscribed before me this 29th day of Sept, 2024, by Christopher Gleason, who is personally known to me or who has produced FL Drivers License as identification.

Notary Public

State of Florida

My Commission Expires: [insert date]

[Seal]

NOTARY PUBLIC STATE OF FLORIDA

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF Regina Hansen

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Regina Hansen who, being first duly sworn, deposes and states as follows:

1. My name is Regina Hansen, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9-19-24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

R Hansen
Witness Name Regina Hansen
Address 2427 Finlandia Ln Apt 41, Clearwater, FL 33763
Phone Number 727-788-2772

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Christine Peters
Notary Public, State of Florida

My Commission Expires: _____

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF RICHARD GREENWOOD

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared RICHARD GREENWOOD, who, being first duly sworn, deposes and states as follows:

1. My name is RICHARD GREENWOOD, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9/19/24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

RMG

Witness Name RICHARD GREENWOOD
Address 105 HARBOR BLUFF DR.
Phone Number 951-375-9683

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Christine Peters
Notary Public, State of Florida

My Commission Expires: _____

NOTARY PUBLIC STATE OF FLORIDA
CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF Keith L. Eshelman

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Keith L. Eshelman who, being first duly sworn, deposes and states as follows:

1. My name is Keith L. Eshelman, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on Sept. 19, 2024, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*; 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

Keith L. Eshelman

Witness Name Keith L. Eshelman
Address 2430 Brazilia Dr #4, Clearwater, FL 33763
Phone Number 813-949-7583

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Christine Peters

Notary Public, State of Florida My Commission Expires: 2/26/28

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF Krista Kosier

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Krista Kosier who, being first duly sworn, deposes and states as follows:

1. My name is Krista Kosier, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9/19/24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

Witness Name Krista Kosier
Address 13302 Whispering Palms Pl SW #1202, Largo FL 33774
Phone Number (727) 798-0972

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Notary Public, State of Florida My Commission Expires: 2-26-28

NOTARY PUBLIC STATE OF FLORIDA
CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF SIRENA PELLARDO

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared _____, who, being first duly sworn, deposes and states as follows:

1. My name is SIRENA PELLARDO, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9-19-24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

Witness Name SIRENIA PENARO JR CIRCLE
Address 214 DOGWOOD
Phone Number 619-389-8939

Sworn to and subscribed before me this 19th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Notary Public, State of Florida

My Commission Expires: 2-26-28

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON,

Plaintiff,

vs. Case No. 24-003995-CI

JULIE MARCUS, et al

Defendant.

_____/

PLAINTIFF'S VERIFIED MOTION TO DISQUALIFY
JUDGE PATRICIA MUSCARELLA

COMES NOW, Plaintiff Christopher Gleason, pro se, and pursuant to Rule 2.330 of the Florida Rules of Judicial Administration, respectfully moves this Court to enter an order disqualifying the Honorable Judge Patricia Muscarella from presiding over the above-captioned matter, case pursuant to Rule 2.330 of the Florida Rules of Judicial Administration and in support thereof states as follows:

1. Introduction

This motion is filed in good faith based upon facts and circumstances that would lead a reasonable person to fear that they would not receive a fair and impartial hearing or trial if Judge Muscarella continues to preside over this case.

2. Background

Plaintiff has been engaged in litigation against the Pinellas County Supervisor of Elections concerning allegations of unlawful concealment, delay, and alteration of public records and election records including Election Summary Reports, Precinct Summary Reports, illegal requests for vote by mail ballots, ballots being illegally and fraudulently cast and the illegal administration and illegal certification of elections using voting systems with no valid or legal certification in violation of Florida's Public Records Laws, Florida Election Code, Federal Election Code and election transparency requirements. In Case No. 23-6698, Judge Muscarella's repeated failure to rule on critical motions—particularly motions for judicial notice and discovery—combined with her failure to address serious irrefutable claims of voter disenfranchisement through the omission of thousands of blank ballots, has resulted in a well-grounded fear that Judge Muscarella cannot provide an impartial and fair hearing. Plaintiff is once again representing himself as a pro se litigant, but the ongoing issues in the present case are compounded by new evidence that suggests the Pinellas County Supervisor of Elections engaged in similar misconduct during the administration of the 2010 judicial election of Judge Patricia Muscarella. These allegations create an additional, direct conflict of interest.

3. Legal Standard

Rule 2.330(d)(1) of the Florida Rules of Judicial Administration states that a judge should be disqualified when the party fears that they will not receive a fair trial or hearing because of specifically alleged facts. The fear must be objectively reasonable. Under Canon 2A of the Florida Code of Judicial Conduct, judges must act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary. Canon 3B(7) requires judges to rule on all matters promptly and fairly, which Judge Muscarella failed to do by not addressing critical motions in the prior case. Furthermore, Canon 3E(1) mandates recusal where a judge's

impartiality might reasonably be questioned. In this case, the combination of Judge Muscarella's prior failure to rule fairly on motions, her unfair treatment of a pro se litigant, and the direct conflict arising from the administration of her own 2010 election by the same Supervisor of Elections, clearly meets the legal standard for recusal. In Livingston v. State, 441 So. 2d 1083 (Fla. 1983), the Florida Supreme Court held that the test for judicial disqualification is whether a reasonably prudent person, knowing all the facts, would have a reasonable fear of not receiving a fair trial. Here, the totality of the circumstances, including the conflict involving Judge Muscarella's election and the pattern of her conduct in the prior case, fully supports recusal.

4. Facts Supporting Disqualification

The following facts, known to the undersigned, support a well-founded fear that the Judge is biased or prejudiced against the Plaintiff:

a. Plaintiff filed a motion for judicial notice, requesting the Court to acknowledge statutory requirements regarding the Supervisor of Elections' duties under Florida law, including the obligation to provide complete, unredacted and unaltered public records and official election records. Judge Muscarella failed to rule on this motion, depriving Plaintiff of the ability to have these fundamental legal points acknowledged by the Court.

b. In connection with Plaintiff's allegations of voter disenfranchisement through blank ballots and omissions in the election summary reports also known as the EL45A reports and the precinct level election reports also known as the EL30A reports, Plaintiff sought discovery to obtain critical evidence of the Supervisor of Elections' conduct. Judge Muscarella did not rule on the motion for discovery, effectively blocking Plaintiff from gathering evidence essential to proving his claims. This failure to allow full discovery was particularly prejudicial to Plaintiff,

who was acting pro se at the time and was disadvantaged in navigating complex procedural matters.

c. Plaintiff, previously a pro se litigant, was subject to unfair treatment during the earlier proceedings, in which Judge Muscarella failed to rule on essential motions and disregarded significant claims involving voter disenfranchisement and public records concealment and alteration by the Pinellas County Supervisor of Elections.

d. The Plaintiff, as a pro se litigant is bringing a contest of election challenge based on fraud, official misconduct, corrupt practices and further violations of the Florida Constitution, the United State Constitution, Florida Election Statutes, Federal Election Statutes, and now brings this motion in light of serious concerns regarding the administration of Judge Muscarella's own 2010 election by the Pinellas County Supervisor of Elections, implicating a conflict of interest.

e. Plaintiff filed a motion for judicial notice, requesting the Court to acknowledge statutory requirements regarding the Supervisor of Elections' duties under Florida law, including the obligation to provide complete, unredacted and unaltered public records and official election records. Judge Muscarella failed to rule on this motion, depriving Plaintiff of the ability to have these fundamental legal points acknowledged by the Court.

f. In connection with Plaintiff's allegations of voter disenfranchisement through blank ballots and omissions in the election summary reports also known as the EL45A reports and the precinct level election reports also known as the EL30A reports, Plaintiff sought discovery to obtain critical evidence of the Supervisor of Elections' conduct. Judge Muscarella did not rule on the motion for discovery, effectively blocking Plaintiff from gathering evidence essential to proving his claims. This failure to allow full discovery was particularly prejudicial to Plaintiff,

who was acting pro se at the time and was disadvantaged in navigating complex procedural matters.

g. During the previous proceeding, Plaintiff represented himself pro se and was subject to unfair treatment that further supports the reasonable belief that Judge Muscarella's handling of the case was biased. Courts have a duty to ensure pro se litigants receive fair treatment, yet Judge Muscarella's consistent failure to rule on key motions and to address substantive issues raised by Plaintiff, including substantial claims of voter disenfranchisement, demonstrates a lack of impartiality.

h. The Pinellas County Circuit Court's procedural delays and Judge Muscarella's refusal to allow discovery and take judicial notice effectively denied Plaintiff access to the evidence needed to substantiate his claims, while favoring the defense's arguments, including accepting without scrutiny the defense counsel's fraudulent misrepresentation regarding the statutory requirements for election reports. This unfair treatment of a pro se litigant raises serious ethical concerns under Florida's judicial canons.

i. Compounding these concerns is the fact that the issues being litigated in the current case involve similar allegations of unlawful election practices by the Supervisor of Elections that implicate the administration of the 2010 judicial election of Judge Patricia Muscarella. Plaintiff has obtained evidence indicating that the same practices involving the concealment of public records, the unlawful administration of elections using electronic voting systems that have modems attached voiding their certification and the failure to properly report voter data—including blank ballots, and vote by mail fraud—were employed during the election in which Judge Muscarella was elected.

j. This creates an inherent conflict of interest, as Judge Muscarella's impartiality is now in question, given that the allegations in this case directly relate to the actions of the Pinellas County Supervisor of Elections in administering her own election. A reasonable person, aware of these facts, would have a well-founded fear that Judge Muscarella cannot be impartial in ruling on a case that involves misconduct by the very office that oversaw her election.

5. Fear of Bias

Based on these facts, the undersigned genuinely fears that they will not receive a fair and impartial hearing or trial due to the judge's actions, statements, or relationships.

6. Timeliness

This motion is filed timely and within ten (10) days of discovering the facts that give rise to the fear of prejudice. Under Rule 2.330(e), the motion must be filed immediately upon discovery of the grounds for disqualification.

7. Relief Requested

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court:

1. Enter an order disqualifying the Honorable Judge Patricia Muscarella from presiding over any further proceedings in this case.

2. Reassign this case to a different judge as provided under the rules governing the Sixth Judicial Circuit in Florida.

VERIFICATION

I, Christopher Gleason, hereby verify that the facts stated in this motion are true and correct to the best of my knowledge and belief.

Respectfully submitted,

/s/ Christopher Gleason

Christopher Gleason

1628 Sand Key Estates Court

Clearwater, FL 33767

727-480-2059

gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via email on this September 19, 2024 to: JARED N. KAHN, ESQ., Attorney for Defendant Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections, at jkahn@pinellas.gov and eservice@pinellas.gov and to JEFFREY N. KLEIN, ESQ., Attorney for Defendant Pinellas County Canvassing Board, at jklein@pinellas.gov and eservice@pinellas.gov.

JARED D. KAHN

Florida Bar Number 105276

Senior Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, Sixth Floor

Clearwater, FL 33756

Primary e-mail address: jkahn@pinellas.gov

Secondary e-mail address: eservice@pinellas.gov

Attorney for Julie Marcus, in her official capacity as

Pinellas County Supervisor of Elections

JEFFREY N. KLEIN
Florida Bar Number 1025117
Assistant County Attorney
Pinellas County Attorney's Office
315 Court Street, 6th Floor.
Clearwater, FL 33756
Tel: 727-464-3354/Fax: 727-464-4147
Primary e-mail address: jklein@pinellas.gov
Secondary e-mail address: eservice@pinellas.gov
Attorney for Defendant, Attorney for the Pinellas
County Canvassing Board

/s/ Christopher Gleason

Dated: 09/19/2024

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON,

Plaintiff,

vs. **Case No.: 24-003995-CI**

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections and PINELLAS COUNTY CANVASSING BOARD,

Defendants.
_____/

ORDER DENYING PLAINTIFF'S VERIFIED MOTION TO DISQUALIFY JUDGE PATRICIA MUSCARELLA

THIS MATTER came before the Court on September 19, 2024, on Plaintiff's Motion to Disqualify Judge Patricia Muscarella. Having considered the motion, the case file, the applicable law, and being otherwise fully advised in the premises, the Court hereby

FINDS AND ORDERS:

that the Motion to Disqualify is legally insufficient.

Accordingly, it is

ORDERED AND ADJUDGED that Plaintiff's Verified Motion to Disqualify Judge Patricia Muscarella is **DENIED.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 19th day of September 2024. A true and correct copy of the foregoing has been furnished to the parties listed below.

24-003995-CI 9/19/2024 1:27:43 PM
Circuit Judge Patricia A. Muscarella
24-003995-CI 9/19/2024 1:27:43 PM

Honorable Patricia Muscarella
Circuit Civil Judge

ELECTRONICALLY FILED 9/19/2024 1:27:43 PM KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Copies furnished to:

Christopher Gleason
1628 Sand Key Estates Court
Clearwater, FL 33767
gleasonforpinellas@gmail.com
Pro Se Plaintiff

Julie Marcus
c/o Jared D. Khan, Esq.
Pinellas County Attorney's Office
315 Court Street, Sixth Floor
Clearwater, FL 33756
Defendant

Pinellas County Canvassing Board
c/o Jeffrey N. Klein, Esq.
Pinellas County Attorney's Office
315 Court Street, Sixth Floor
Clearwater, FL 33756

Filing # 207254000 E-Filed 09/19/2024 12:09:05 PM

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON,

Plaintiff,

vs. Case No. 24-003717-CI

JULIE MARCUS, et al

Defendant.

_____/

PLAINTIFF'S VERIFIED MOTION TO DISQUALIFY
JUDGE PATRICIA MUSCARELLA

COMES NOW, Plaintiff Christopher Gleason, pro se, and pursuant to Rule 2.330 of the Florida Rules of Judicial Administration, respectfully moves this Court to enter an order disqualifying the Honorable Judge Patricia Muscarella from presiding over the above-captioned matter, case pursuant to Rule 2.330 of the Florida Rules of Judicial Administration and in support thereof states as follows:

1. Introduction

This motion is filed in good faith based upon facts and circumstances that would lead a reasonable person to fear that they would not receive a fair and impartial hearing or trial if Judge Muscarella continues to preside over this case.

2. Background

ELECTRONICALLY FILED 09/19/2024 12:09:04 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Plaintiff has been engaged in litigation against the Pinellas County Supervisor of Elections concerning allegations of unlawful concealment, delay, and alteration of public records and election records including Election Summary Reports, Precinct Summary Reports, illegal requests for vote by mail ballots, ballots being illegally and fraudulently cast and the illegal administration and illegal certification of elections using voting systems with no valid or legal certification in violation of Florida's Public Records Laws, Florida Election Code, Federal Election Code and election transparency requirements. In Case No. 23-6698, Judge Muscarella's repeated failure to rule on critical motions—particularly motions for judicial notice and discovery—combined with her failure to address serious irrefutable claims of voter disenfranchisement through the omission of thousands of blank ballots, has resulted in a well-grounded fear that Judge Muscarella cannot provide an impartial and fair hearing. Plaintiff is once again representing himself as a pro se litigant, but the ongoing issues in the present case are compounded by new evidence that suggests the Pinellas County Supervisor of Elections engaged in similar misconduct during the administration of the 2010 judicial election of Judge Patricia Muscarella. These allegations create an additional, direct conflict of interest.

3. Legal Standard

Rule 2.330(d)(1) of the Florida Rules of Judicial Administration states that a judge should be disqualified when the party fears that they will not receive a fair trial or hearing because of specifically alleged facts. The fear must be objectively reasonable. Under Canon 2A of the Florida Code of Judicial Conduct, judges must act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary. Canon 3B(7) requires judges to rule on all matters promptly and fairly, which Judge Muscarella failed to do by not addressing critical motions in the prior case. Furthermore, Canon 3E(1) mandates recusal where a judge's

impartiality might reasonably be questioned. In this case, the combination of Judge Muscarella's prior failure to rule fairly on motions, her unfair treatment of a pro se litigant, and the direct conflict arising from the administration of her own 2010 election by the same Supervisor of Elections, clearly meets the legal standard for recusal. In Livingston v. State, 441 So. 2d 1083 (Fla. 1983), the Florida Supreme Court held that the test for judicial disqualification is whether a reasonably prudent person, knowing all the facts, would have a reasonable fear of not receiving a fair trial. Here, the totality of the circumstances, including the conflict involving Judge Muscarella's election and the pattern of her conduct in the prior case, fully supports recusal.

4. Facts Supporting Disqualification

The following facts, known to the undersigned, support a well-founded fear that the Judge is biased or prejudiced against the Plaintiff:

a. Plaintiff filed a motion for judicial notice, requesting the Court to acknowledge statutory requirements regarding the Supervisor of Elections' duties under Florida law, including the obligation to provide complete, unredacted and unaltered public records and official election records. Judge Muscarella failed to rule on this motion, depriving Plaintiff of the ability to have these fundamental legal points acknowledged by the Court.

b. In connection with Plaintiff's allegations of voter disenfranchisement through blank ballots and omissions in the election summary reports also known as the EL45A reports and the precinct level election reports also known as the EL30A reports, Plaintiff sought discovery to obtain critical evidence of the Supervisor of Elections' conduct. Judge Muscarella did not rule on the motion for discovery, effectively blocking Plaintiff from gathering evidence essential to proving his claims. This failure to allow full discovery was particularly prejudicial to Plaintiff,

who was acting pro se at the time and was disadvantaged in navigating complex procedural matters.

c. Plaintiff, previously a pro se litigant, was subject to unfair treatment during the earlier proceedings, in which Judge Muscarella failed to rule on essential motions and disregarded significant claims involving voter disenfranchisement and public records concealment and alteration by the Pinellas County Supervisor of Elections.

d. The Plaintiff, as a pro se litigant is bringing a contest of election challenge based on fraud, official misconduct, corrupt practices and further violations of the Florida Constitution, the United State Constitution, Florida Election Statutes, Federal Election Statutes, and now brings this motion in light of serious concerns regarding the administration of Judge Muscarella's own 2010 election by the Pinellas County Supervisor of Elections, implicating a conflict of interest.

e. Plaintiff filed a motion for judicial notice, requesting the Court to acknowledge statutory requirements regarding the Supervisor of Elections' duties under Florida law, including the obligation to provide complete, unredacted and unaltered public records and official election records. Judge Muscarella failed to rule on this motion, depriving Plaintiff of the ability to have these fundamental legal points acknowledged by the Court.

f. In connection with Plaintiff's allegations of voter disenfranchisement through blank ballots and omissions in the election summary reports also known as the EL45A reports and the precinct level election reports also known as the EL30A reports, Plaintiff sought discovery to obtain critical evidence of the Supervisor of Elections' conduct. Judge Muscarella did not rule on the motion for discovery, effectively blocking Plaintiff from gathering evidence essential to proving his claims. This failure to allow full discovery was particularly prejudicial to Plaintiff,

who was acting pro se at the time and was disadvantaged in navigating complex procedural matters.

g. During the previous proceeding, Plaintiff represented himself pro se and was subject to unfair treatment that further supports the reasonable belief that Judge Muscarella's handling of the case was biased. Courts have a duty to ensure pro se litigants receive fair treatment, yet Judge Muscarella's consistent failure to rule on key motions and to address substantive issues raised by Plaintiff, including substantial claims of voter disenfranchisement, demonstrates a lack of impartiality.

h. The Pinellas County Circuit Court's procedural delays and Judge Muscarella's refusal to allow discovery and take judicial notice effectively denied Plaintiff access to the evidence needed to substantiate his claims, while favoring the defense's arguments, including accepting without scrutiny the defense counsel's fraudulent misrepresentation regarding the statutory requirements for election reports. This unfair treatment of a pro se litigant raises serious ethical concerns under Florida's judicial canons.

i. Compounding these concerns is the fact that the issues being litigated in the current case involve similar allegations of unlawful election practices by the Supervisor of Elections that implicate the administration of the 2010 judicial election of Judge Patricia Muscarella. Plaintiff has obtained evidence indicating that the same practices involving the concealment of public records, the unlawful administration of elections using electronic voting systems that have modems attached voiding their certification and the failure to properly report voter data—including blank ballots, and vote by mail fraud—were employed during the election in which Judge Muscarella was elected.

j. This creates an inherent conflict of interest, as Judge Muscarella's impartiality is now in question, given that the allegations in this case directly relate to the actions of the Pinellas County Supervisor of Elections in administering her own election. A reasonable person, aware of these facts, would have a well-founded fear that Judge Muscarella cannot be impartial in ruling on a case that involves misconduct by the very office that oversaw her election.

5. Fear of Bias

Based on these facts, the undersigned genuinely fears that they will not receive a fair and impartial hearing or trial due to the judge's actions, statements, or relationships.

6. Timeliness

This motion is filed timely and within ten (10) days of discovering the facts that give rise to the fear of prejudice. Under Rule 2.330(e), the motion must be filed immediately upon discovery of the grounds for disqualification.

7. Relief Requested

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court:

1. Enter an order disqualifying the Honorable Judge Patricia Muscarella from presiding over any further proceedings in this case.

2. Reassign this case to a different judge as provided under the rules governing the Sixth Judicial Circuit in Florida.

VERIFICATION

I, Christopher Gleason, hereby verify that the facts stated in this motion are true and correct to the best of my knowledge and belief.

Respectfully submitted,

/s/ Christopher Gleason

Christopher Gleason

1628 Sand Key Estates Court

Clearwater, FL 33767

727-480-2059

gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via email on this September 19, 2024 to: JARED N. KAHN, ESQ., Attorney for Defendant Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections, Dustin Chase in his official capacity as the Deputy Supervisor of Elections and Matt Smith in his official capacity as General Counsel for the Pinellas County Supervisor of Elections, at jkahn@pinellas.gov and

eservice@pinellas.gov and to KELLY L. VICARI, Attorney for Defendant Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections, Dustin Chase in his official capacity as the Deputy Supervisor of Elections and Matt Smith in his official capacity as General Counsel for the Pinellas County Supervisor of Elections, at kvicari@pinellas.gov and eservice@pinellas.gov .

.

JARED D. KAHN

Florida Bar Number 105276

Senior Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, Sixth Floor

Clearwater, FL 33756

Primary e-mail address: jkahn@pinellas.gov

Secondary e-mail address: eservice@pinellas.gov
Attorney for Julie Marcus, in her official capacity as
Pinellas County Supervisor of Elections

KELLY L. VICARI
FBN: 88704
Assistant County Attorney
Pinellas County Attorney's Office
315 Court Street, Sixth Floor
Clearwater, FL 33756
Phone: (727) 464-3354 / Fax: (727) 464-4147
Primary e-mail address: kvicari@pinellas.gov
Secondary e-mail address: eservice@pinellas.gov

JEFFREY N. KLEIN
Florida Bar Number 1025117
Assistant County Attorney
Pinellas County Attorney's Office
315 Court Street, 6th Floor.
Clearwater, FL 33756
Tel: 727-464-3354/Fax: 727-464-4147
Primary e-mail address: jklein@pinellas.gov
Secondary e-mail address: eservice@pinellas.gov
Attorney for Defendant, Attorney for the Pinellas
County Canvassing Board

/s/ Christopher Gleason

Dated: 09/19/2024

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON,

Plaintiff,

vs. **Case No.: 24-003717-CI**

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections; et. al.,

Defendants.

_____/

ORDER DENYING PLAINTIFF'S VERIFIED MOTION TO DISQUALIFY JUDGE PATRICIA MUSCARELLA

THIS MATTER came before the Court on September 19, 2024, on Plaintiff's Motion to Disqualify Judge Patricia Muscarella. Having considered the motion, the case file, the applicable law, and being otherwise fully advised in the premises, the Court hereby

FINDS AND ORDERS:

that the Motion to Disqualify is legally insufficient.

Accordingly, it is

ORDERED AND ADJUDGED that Plaintiff's Verified Motion to Disqualify Judge Patricia Muscarella is **DENIED.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 19th day of September 2024. A true and correct copy of the foregoing has been furnished to the parties listed below.

24-003717-CI 9/19/2024 1:21:37 PM
Circuit Judge Patricia A. Muscarella
24-003717-CI 9/19/2024 1:21:37 PM
Honorable Patricia Muscarella
Circuit Civil Judge

ELECTRONICALLY FILED 9/19/2024 1:21:37 PM KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Copies furnished to:

Christopher Gleason
1628 Sand Key Estates Court
Clearwater, FL 33767
gleasonforpinellas@gmail.com
Pro Se Plaintiff

Julie Marcus
c/o Matthew M. Smith, Esq.
Pinellas County Supervisor of Elections
13001 Starkey Rd.
Largo, FL 33773-1416
masmith@votepinellas.gov
Defendant

Dustin Chase
c/o Matthew M. Smith, Esq.
Pinellas County Supervisor of Elections
13001 Starkey Rd.
Largo, FL 33773-1416
masmith@votepinellas.gov
Defendant

Matt Smith
Pinellas County Supervisor of Elections
13001 Starkey Rd.
Largo, FL 33773-1416
masmith@votepinellas.gov
Defendant

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON,

Plaintiff,

vs. **Case No.: 24-003717-CI**

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et. al.,

Defendants.
_____/

ORDER DENYING PLAINTIFF'S RENEWED MOTION FOR RECUSAL/DISQUALIFICATION OF JUDGE PATRICIA MUSCARELLA PURSUANT TO SECTION 38.10, FLORIDA STATUTES

THIS MATTER is before the Court on Plaintiff's Renewed Motion for Recusal/Disqualification of Judge Patricia Muscarella Pursuant to Section 38.10, Florida Statutes ("Motion") dated October 21, 2024. Having considered the Motion, the case file, the applicable law, and being otherwise fully advised in the premises, the Court hereby

FINDS AND ORDERS:

The Motion is legally insufficient. *See* Fla. R. Gen. Prac. & Jud. Admin. 2.330(d).

Accordingly, it is

ORDERED AND ADJUDGED that Plaintiff's Motion is **DENIED.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 22nd day of October 2024. A true and correct copy of the foregoing has been furnished to the parties listed below.

24-003717-CI 10/22/2024 11:08:28 AM
Circuit Judge Patricia A. Muscarella
24-003717-CI 10/22/2024 11:08:28 AM
Honorable Patricia A. Muscarella
Circuit Civil Judge

Copies furnished to:

Christopher Gleason
1628 Sand Key Estates Court

ELECTRONICALLY FILED 10/22/2024 11:08:28 AM KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Clearwater, FL 33767
gleasonforpinellas@gmail.com
Pro Se Plaintiff

Jared D. Kahn, Esq.
Kelly L. Vicari, Esq.
Pinellas County Attorney's Office
315 Court St.
Floor 6
Clearwater, FL 33756
jkahn@pinellascounty.org
kvicari@pinellascounty.org
eservice@pinellascounty.org
Counsel for Defendants

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON,

Plaintiff,

CASE NO.: 24-003717-CI
UCN:522024CA003717XXCICI

v.

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections;
DUSTIN CHASE, in his official capacity as Deputy Supervisor of Elections of Pinellas County, Florida;
MATT SMITH, in his official capacity as General Counsel for Pinellas County Supervisor of Elections;
KELLY L. VICARI, in her individual and professional capacity;
JARED D. KAHN, in his individual and professional capacity;
and the **CANVASSING BOARD OF PINELLAS COUNTY**
Defendants.

_____/

PLAINTIFF'S RENEWED MOTION FOR RECUSAL/DISQUALIFICATION OF JUDGE PATRICIA MUSCARELLA PURSUANT TO SECTION 38.10, FLORIDA STATUTES

COMES NOW the Plaintiff, Christopher Gleason, appearing pro se, and hereby moves this Honorable Court for the recusal/disqualification of Judge Patricia Muscarella from presiding over this case pursuant to Section 38.10, Florida

ELECTRONICALLY FILED 10/21/2024 02:15:31 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Statutes, and Rule 2.330 of the Florida Rules of General Practice and Judicial Administration. In support of this Motion, Plaintiff submits the following:

I. LEGAL BASIS FOR RECUSAL/DISQUALIFICATION

1. Section 38.10, Florida Statutes states:

> "Whenever a party makes and files an affidavit stating fear that the party will not receive a fair trial on account of the prejudice of the judge, the judge shall proceed no further, but another judge shall be designated."

- The statutory mandate is unequivocal. When a party's affidavit alleges fear of prejudice, and it is legally sufficient, the presiding judge must cease further proceedings and transfer the case to another judge. The standard for sufficiency is grounded not in proof of actual prejudice but in the appearance of potential bias.

2. Florida Rule of General Practice and Judicial Administration 2.330 dictates that:

- A motion for disqualification must be granted if a reasonably prudent person in the movant's position would fear not receiving a fair and impartial trial before the assigned judge. The motion and accompanying affidavit(s) need only be "legally sufficient," a standard satisfied when the motion sets forth facts that, if true, would place a reasonable person in fear of judicial bias.

II. FACTUAL BASIS SUPPORTING DISQUALIFICATION

3. Plaintiff's fear that Judge Muscarella is prejudiced is well-founded, substantiated by his own sworn affidavit and corroborated by sworn affidavits from five witnesses. These affidavits establish a consistent pattern of judicial conduct that demonstrates actual bias or, at minimum, the appearance thereof.

III. GROUNDS FOR DISQUALIFICATION

A. Repeated Failure to Rule on Critical Motions:

- Judge Muscarella has consistently failed to rule on Plaintiff's motions for judicial notice, discovery, and other critical motions necessary to the litigation of this case. Florida jurisprudence establishes that undue delay or failure to rule on motions constitutes a denial of due process. As held in *State ex rel. Davis v. Parks*, 141 So. 2d 638 (Fla. 1932), justice delayed is justice denied, and such delays cast doubt on the impartiality and efficiency of the judiciary.

B. Evidence of Conflict of Interest:

- Plaintiff has obtained evidence indicating that the Pinellas County Supervisor of Elections engaged in similar electoral improprieties during Judge Muscarella's 2010 judicial election. This creates an irrefutable conflict of interest. As noted in *State ex rel. Mickler v. Rowe*, 126 So. 2d 129 (Fla. 1960), a judge must recuse themselves when an appearance of bias or impropriety exists. The conflict is not merely hypothetical but grounded in Plaintiff's evidence, demonstrating Judge Muscarella's potential vested interest in protecting the Defendant.

C. Improper Reliance on Defense Counsel's Representations:

- On September 19, 2024, Judge Muscarella admitted unfamiliarity with relevant election law and sought guidance from defense counsel, Mr. Jared Kahn, on how to proceed. This reliance on defense counsel's guidance over Plaintiff's arguments contravenes the judicial duty of impartiality, as articulated in *The Florida Bar v.

Cox*, 794 So. 2d 1278 (Fla. 2001). The impartial role of a judge requires independent evaluation of the law, not deferring to one party's counsel.

D. Acceptance of Misrepresentations Without Verification:

- Defense counsel falsely claimed that Exhibit G contained information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the information being widely accessible online. Judge Muscarella accepted this misrepresentation without requiring proof. In *Holloway v. State*, 342 So. 2d 966 (Fla. 1st DCA 1977), the court held that uncritically accepting one party's assertions is indicative of prejudice.

E. Disparate Treatment of Pro Se Litigant:

- The Florida judiciary recognizes the rights of pro se litigants to be treated fairly and ***equitably (Platel v. Maguire, Voorhis & Wells, P.A., 436 So. 2d 303 (Fla. 5th DCA 1983))***. Judge Muscarella's consistent deference to defense counsel and disregard for Plaintiff's arguments exhibits a clear bias against the Plaintiff as a self-represented litigant.

F. Prohibition on Recording Court Proceedings:

- Judge Muscarella's prohibition of recording court hearings is contrary to the principles of transparency mandated by ***In re Petition of Post-Newsweek Stations, Florida, Inc., 370 So. 2d 764 (Fla. 1979)***. The absence of any valid basis for this restriction raises concerns about transparency and impartiality.

G. Excessive Sealing of Exhibits:

- The Florida Constitution, Article I, Section 24, and Chapter 119 of the Florida Statutes emphasize transparency and open government. Judge Muscarella's order to seal all exhibits without using the least restrictive means violates Rule 2.420, Florida Rules of General Practice and Judicial Administration, and raises further concerns about her impartiality. As ruled in ***Barron v. Florida Freedom Newspapers, Inc., 531 So. 2d 113 (Fla. 1988)***, excessive secrecy is inimical to the public interest.

IV. AFFIDAVITS IN SUPPORT OF MOTION

4. Plaintiff's Affidavit is attached hereto, setting forth detailed facts substantiating the claim of bias and prejudice.

5. Affidavits of Five Witnesses are attached, corroborating Plaintiff's assertions of judicial bias and confirming specific incidents that exemplify Judge Muscarella's partiality.

- Each affidavit attests to observations of Judge Muscarella's statements, rulings, demeanor, and conduct that display a clear bias against Plaintiff, as well as her overt favoritism toward defense counsel, Mr. Jared Kahn.

V. LEGAL ANALYSIS

6. Florida courts have consistently upheld that a judge must be disqualified where there is an objectively reasonable fear of bias. The Plaintiff's allegations, supported by multiple sworn affidavits, provide ample grounds for such fear.

- ***In MacKenzie v. Super Kids Bargain Store, Inc., 565 So. 2d 1332 (Fla. 1990)***, the Florida Supreme Court reaffirmed that disqualification is appropriate where a party harbors a well-founded fear of not receiving a fair trial, even in the absence of proven actual bias.

- In ***Livingston v. State, 441 So. 2d 1083 (Fla. 1983)***, the Court held that the appearance of justice must be maintained, stating, "It is the very essence of a fair trial that the judge be impartial and that there be an appearance of impartiality."

VI. CONCLUSION

7. Based on the detailed facts and legal authorities presented, it is evident that Judge Patricia Muscarella's continued involvement in this case would undermine Plaintiff's constitutional right to a fair and impartial trial.

8. The facts, when viewed objectively, establish a reasonable fear of prejudice that warrants the immediate disqualification of Judge Muscarella under Section 38.10, Florida Statutes, and Rule 2.330 of the Florida Rules of General Practice and Judicial Administration.

WHEREFORE, Plaintiff respectfully requests that:

1. This Honorable Court GRANT Plaintiff's Motion for Recusal/Disqualification.

2. This matter be reassigned to another judge who can ensure the fair, impartial, and just adjudication of Plaintiff's claims.

CERTIFICATE OF GOOD FAITH

I, Christopher Gleason, certify that this motion is made in good faith and not for purposes of delay. The facts presented are true to the best of my knowledge and belief, and I genuinely fear that I will not receive a fair trial if Judge Muscarella continues to preside.

Respectfully submitted,

/s/ Christopher Gleason

Christopher Gleason

1628 Sand Key Estates Court

Clearwater, FL 33767

727-480-2059

gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via email on this October 1, 2024 to: JARED N. KAHN, ESQ., Attorney for Defendant Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections, Dustin Chase in his official capacity as the Deputy Supervisor of Elections and Matt Smith in his official capacity as General Counsel for the Pinellas County Supervisor of Elections, at jkahn@pinellas.govand eservice@pinellas.gov and to KELLY L. VICARI, Attorney for Defendant Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections, Dustin Chase in his official capacity as the Deputy Supervisor of Elections and Matt Smith in his official capacity as General Counsel for the Pinellas County Supervisor of Elections, at kvicari@pinellas.gov and eservice@pinellas.gov .

JARED D. KAHN

Florida Bar Number 105276

Senior Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, Sixth Floor

Clearwater, FL 33756

Primary e-mail address: jkahn@pinellas.gov

Secondary e-mail address: eservice@pinellas.gov

Attorney for Julie Marcus, in her official capacity as

Pinellas County Supervisor of Elections

KELLY L. VICARI

FBN: 88704

Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, Sixth Floor

Clearwater, FL 33756

Phone: (727) 464-3354 / Fax: (727) 464-4147

Primary e-mail address: kvicari@pinellas.gov

Secondary e-mail address: eservice@pinellas.gov

JEFFREY N. KLEIN

Florida Bar Number 1025117

Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, 6th Floor.

Clearwater, FL 33756

Tel: 727-464-3354/Fax: 727-464-4147

Primary e-mail address: jklein@pinellas.gov

Secondary e-mail address: eservice@pinellas.gov

Attorney for Defendant, Attorney for the Pinellas

County Canvassing Board

/s/ Christopher Gleason

Dated: 09/23/2024

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON,

Plaintiff,

CASE NO.: 24-003717-CI
UCN:522024CA003717XXCICI

v.

JULIE MARCUS,

in her official capacity as

Pinellas County Supervisor of Elections; et al.,

Defendants.

AFFIDAVIT OF CHRISTOPHER GLEASON IN SUPPORT OF RENEWED MOTION FOR DISQUALIFICATION

STATE OF FLORIDA
COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared CHRISTOPHER GLEASON, who, being first duly sworn, deposes and states as follows:

1. My name is Christopher Gleason, and I am the Plaintiff in the above-captioned case currently pending before the Circuit Court of the Sixth Judicial Circuit in and for Pinellas County, Florida.

2. I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and belief.

3. I have a well-founded fear that I will not receive a fair trial in this case due to the demonstrated bias and prejudice of the presiding judge, the Honorable Judge Muscarella. This fear is reasonable and based on the following facts and circumstances:

A. Reliance on Defense Counsel's Misrepresentations

4. Throughout the proceeding, Judge Muscarella has consistently relied on the representations and arguments made by defense counsel, Mr. Jared Kahn, without independent verification or examination of the accuracy and legal validity of these statements.

5. Specifically, defense counsel misrepresented the legal status of Exhibit G by claiming that it contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d). Despite there being no valid basis or supporting evidence for such a claim, Judge Muscarella accepted these assertions without requiring defense counsel to provide proof or further clarification.

6. By adopting the defense counsel's misrepresentations, Judge Muscarella has shown a lack of impartiality and a predisposition to favor the defense's position, thereby undermining my confidence in her ability to preside over this case fairly and without bias.

B. Disregard for My Rights as a Pro Se Litigant

7. I am representing myself in this matter as a pro se litigant, which places me at a disadvantage compared to the represented defendants. It is my understanding that as a pro se litigant, I am entitled to the same fair treatment, consideration, and

protection of my rights as any other party appearing before the court, regardless of whether I have legal representation.

8. Despite this, Judge Muscarella has demonstrated a consistent pattern of favoring the defense's arguments and legal positions while disregarding or dismissing my legitimate legal arguments and evidence.

9. On multiple occasions, Judge Muscarella sought guidance and clarification from defense counsel regarding legal procedures and the interpretation of the law. This conduct suggests that Judge Muscarella is improperly relying on defense counsel's advice to guide the proceedings, rather than independently evaluating the issues and ensuring that both parties receive equal and fair treatment under the law.

10. The court's deference to defense counsel has created an imbalance in the proceedings and a well-founded fear that Judge Muscarella is not providing me, as a pro se litigant, the fair and impartial trial to which I am entitled under Florida law.

C. Unjustified Prohibition on Recording Court Proceedings

11. During the course of these proceeding, Judge Muscarella issued an order prohibiting the recording of court hearings, without providing any valid legal basis or compelling justification for such a restriction.

12. As a pro se litigant, I rely on the ability to record court proceedings to ensure that I have an accurate record of the hearings, which is essential for preserving my right to appeal or seek review of any adverse rulings. The prohibition on recording has significantly hindered my ability to protect my legal interests and maintain an accurate record of these proceedings.

13. The Florida Supreme Court has held that court proceedings should be open to the public and that recording should be permitted unless there is a compelling reason to restrict it ***(*In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979))***. Judge Muscarella's prohibition on recording, without a valid justification, raises concerns about transparency and suggests an attempt to limit public scrutiny, further contributing to my fear of bias.

D. Appearance of Impropriety and Bias

14. The Florida Supreme Court has made it clear that a judge should be disqualified if the facts create a reasonable fear that a party will not receive a fair trial ***(*MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990))***. The appearance of impropriety, partiality, or favoritism is sufficient grounds for recusal.

15. Based on the totality of the circumstances, including Judge Muscarella's reliance on defense counsel's guidance, disregard for my rights as a pro se litigant, and the unjustified prohibition on recording court proceedings, I have a well-founded fear that Judge Muscarella is biased and unable to preside over this case impartially.

16. Statement of Good Faith

16. I make this affidavit in good faith and not for the purpose of delay. I genuinely fear that I will not receive a fair and impartial trial if Judge Muscarella continues to preside over this case.

WHEREFORE, I respectfully request that Judge Muscarella be disqualified from this case pursuant to Section 38.10, Florida Statutes, and that this matter be reassigned to another judge who can ensure that I receive a fair and impartial trial.

FURTHER AFFIANT SAYETH NAUGHT

Dated this 29th day of Septmb, 2024

Christopher Gleason

Plaintiff

NOTARY ACKNOWLEDGMENT

STATE OF FLORIDA

COUNTY OF PINELLAS

SWORN TO and subscribed before me this 29th day of Sept, 2024 by Christopher Gleason, who is personally known to me or who has produced FL Drivers License as identification.

Notary Public

State of Florida

My Commission Expires: [insert date]

[Seal]

NOTARY PUBLIC STATE OF FLORIDA

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF Regina Hansen

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Regina Hansen who, being first duly sworn, deposes and states as follows:

1. My name is Regina Hansen, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9-19-24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

R Hansen
Witness Name Regina Hansen
Address 2427 Finlandia Ln Apt 41, Clearwater, FL 33763
Phone Number 727-788-2772

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Christine Peters
Notary Public, State of Florida

My Commission Expires: _____

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF RICHARD GREENWOOD

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared RICHARD GREENWOOD who, being first duly sworn, deposes and states as follows:

1. My name is RICHARD GREENWOOD, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9/19/24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

RMG

Witness Name RICHARD GREENWOOD
Address 105 HARBOR BLUFF DR
Phone Number 951. 375-9683

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Christine Peters

Notary Public, State of Florida My Commission Expires: _____

CHRISTINE PETERS
Commission # HH 496853
Expires February 26, 2028

AFFIDAVIT OF Keith L. Eshelman

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Keith L. Eshelman who, being first duly sworn, deposes and states as follows:

1. My name is Keith L. Eshelman, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on Sept. 19, 2024, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*; 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

Keith L. Eshelman

Witness Name Keith L. Eshelman
Address 2430 Brazilia Dr #4, Clearwater, FL 33763
Phone Number 813-949-7583

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Christine Peters

Notary Public, State of Florida

My Commission Expires: 2/26/28

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF Krista Kosier

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Krista Kosier who, being first duly sworn, deposes and states as follows:

1. My name is Krista Kosier, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9/19/24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

Witness Name Krista Kosler
Address 13302 Whispering Palms Pl SW #1202, Largo FL 33774
Phone Number (727) 798-0972

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Notary Public, State of Florida

My Commission Expires: 2-26-28

NOTARY PUBLIC STATE OF FLORIDA
CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF SIRENA PELLARDO

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared _____, who, being first duly sworn, deposes and states as follows:

1. My name is SIRENA PELLARDO, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9-19-24 and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

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11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

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interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

Witness Name SIRENA PELLARO
Address 214 DOGWOOD Circle
Phone Number 619-389-8934

Sworn to and subscribed before me this 19th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Notary Public, State of Florida

My Commission Expires: 2-26-28

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON,

Plaintiff,

vs. Case No. 24-003995-CI

JULIE MARCUS, et al

Defendant.

_____/

PLAINTIFF'S VERIFIED MOTION TO DISQUALIFY
JUDGE PATRICIA MUSCARELLA

COMES NOW, Plaintiff Christopher Gleason, pro se, and pursuant to Rule 2.330 of the Florida Rules of Judicial Administration, respectfully moves this Court to enter an order disqualifying the Honorable Judge Patricia Muscarella from presiding over the above-captioned matter, case pursuant to Rule 2.330 of the Florida Rules of Judicial Administration and in support thereof states as follows:

1. Introduction

This motion is filed in good faith based upon facts and circumstances that would lead a reasonable person to fear that they would not receive a fair and impartial hearing or trial if Judge Muscarella continues to preside over this case.

2. Background

Plaintiff has been engaged in litigation against the Pinellas County Supervisor of Elections concerning allegations of unlawful concealment, delay, and alteration of public records and election records including Election Summary Reports, Precinct Summary Reports, illegal requests for vote by mail ballots, ballots being illegally and fraudulently cast and the illegal administration and illegal certification of elections using voting systems with no valid or legal certification in violation of Florida's Public Records Laws, Florida Election Code, Federal Election Code and election transparency requirements. In Case No. 23-6698, Judge Muscarella's repeated failure to rule on critical motions—particularly motions for judicial notice and discovery—combined with her failure to address serious irrefutable claims of voter disenfranchisement through the omission of thousands of blank ballots, has resulted in a well-grounded fear that Judge Muscarella cannot provide an impartial and fair hearing. Plaintiff is once again representing himself as a pro se litigant, but the ongoing issues in the present case are compounded by new evidence that suggests the Pinellas County Supervisor of Elections engaged in similar misconduct during the administration of the 2010 judicial election of Judge Patricia Muscarella. These allegations create an additional, direct conflict of interest.

3. Legal Standard

Rule 2.330(d)(1) of the Florida Rules of Judicial Administration states that a judge should be disqualified when the party fears that they will not receive a fair trial or hearing because of specifically alleged facts. The fear must be objectively reasonable. Under Canon 2A of the Florida Code of Judicial Conduct, judges must act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary. Canon 3B(7) requires judges to rule on all matters promptly and fairly, which Judge Muscarella failed to do by not addressing critical motions in the prior case. Furthermore, Canon 3E(1) mandates recusal where a judge's

impartiality might reasonably be questioned. In this case, the combination of Judge Muscarella's prior failure to rule fairly on motions, her unfair treatment of a pro se litigant, and the direct conflict arising from the administration of her own 2010 election by the same Supervisor of Elections, clearly meets the legal standard for recusal. In Livingston v. State, 441 So. 2d 1083 (Fla. 1983), the Florida Supreme Court held that the test for judicial disqualification is whether a reasonably prudent person, knowing all the facts, would have a reasonable fear of not receiving a fair trial. Here, the totality of the circumstances, including the conflict involving Judge Muscarella's election and the pattern of her conduct in the prior case, fully supports recusal.

4. Facts Supporting Disqualification

The following facts, known to the undersigned, support a well-founded fear that the Judge is biased or prejudiced against the Plaintiff:

a. Plaintiff filed a motion for judicial notice, requesting the Court to acknowledge statutory requirements regarding the Supervisor of Elections' duties under Florida law, including the obligation to provide complete, unredacted and unaltered public records and official election records. Judge Muscarella failed to rule on this motion, depriving Plaintiff of the ability to have these fundamental legal points acknowledged by the Court.

b. In connection with Plaintiff's allegations of voter disenfranchisement through blank ballots and omissions in the election summary reports also known as the EL45A reports and the precinct level election reports also known as the EL30A reports, Plaintiff sought discovery to obtain critical evidence of the Supervisor of Elections' conduct. Judge Muscarella did not rule on the motion for discovery, effectively blocking Plaintiff from gathering evidence essential to proving his claims. This failure to allow full discovery was particularly prejudicial to Plaintiff,

who was acting pro se at the time and was disadvantaged in navigating complex procedural matters.

c. Plaintiff, previously a pro se litigant, was subject to unfair treatment during the earlier proceedings, in which Judge Muscarella failed to rule on essential motions and disregarded significant claims involving voter disenfranchisement and public records concealment and alteration by the Pinellas County Supervisor of Elections.

d. The Plaintiff, as a pro se litigant is bringing a contest of election challenge based on fraud, official misconduct, corrupt practices and further violations of the Florida Constitution, the United State Constitution, Florida Election Statutes, Federal Election Statutes, and now brings this motion in light of serious concerns regarding the administration of Judge Muscarella's own 2010 election by the Pinellas County Supervisor of Elections, implicating a conflict of interest.

e. Plaintiff filed a motion for judicial notice, requesting the Court to acknowledge statutory requirements regarding the Supervisor of Elections' duties under Florida law, including the obligation to provide complete, unredacted and unaltered public records and official election records. Judge Muscarella failed to rule on this motion, depriving Plaintiff of the ability to have these fundamental legal points acknowledged by the Court.

f. In connection with Plaintiff's allegations of voter disenfranchisement through blank ballots and omissions in the election summary reports also known as the EL45A reports and the precinct level election reports also known as the EL30A reports, Plaintiff sought discovery to obtain critical evidence of the Supervisor of Elections' conduct. Judge Muscarella did not rule on the motion for discovery, effectively blocking Plaintiff from gathering evidence essential to proving his claims. This failure to allow full discovery was particularly prejudicial to Plaintiff,

who was acting pro se at the time and was disadvantaged in navigating complex procedural matters.

g. During the previous proceeding, Plaintiff represented himself pro se and was subject to unfair treatment that further supports the reasonable belief that Judge Muscarella's handling of the case was biased. Courts have a duty to ensure pro se litigants receive fair treatment, yet Judge Muscarella's consistent failure to rule on key motions and to address substantive issues raised by Plaintiff, including substantial claims of voter disenfranchisement, demonstrates a lack of impartiality.

h. The Pinellas County Circuit Court's procedural delays and Judge Muscarella's refusal to allow discovery and take judicial notice effectively denied Plaintiff access to the evidence needed to substantiate his claims, while favoring the defense's arguments, including accepting without scrutiny the defense counsel's fraudulent misrepresentation regarding the statutory requirements for election reports. This unfair treatment of a pro se litigant raises serious ethical concerns under Florida's judicial canons.

i. Compounding these concerns is the fact that the issues being litigated in the current case involve similar allegations of unlawful election practices by the Supervisor of Elections that implicate the administration of the 2010 judicial election of Judge Patricia Muscarella. Plaintiff has obtained evidence indicating that the same practices involving the concealment of public records, the unlawful administration of elections using electronic voting systems that have modems attached voiding their certification and the failure to properly report voter data—including blank ballots, and vote by mail fraud—were employed during the election in which Judge Muscarella was elected.

j. This creates an inherent conflict of interest, as Judge Muscarella's impartiality is now in question, given that the allegations in this case directly relate to the actions of the Pinellas County Supervisor of Elections in administering her own election. A reasonable person, aware of these facts, would have a well-founded fear that Judge Muscarella cannot be impartial in ruling on a case that involves misconduct by the very office that oversaw her election.

5. Fear of Bias

Based on these facts, the undersigned genuinely fears that they will not receive a fair and impartial hearing or trial due to the judge's actions, statements, or relationships.

6. Timeliness

This motion is filed timely and within ten (10) days of discovering the facts that give rise to the fear of prejudice. Under Rule 2.330(e), the motion must be filed immediately upon discovery of the grounds for disqualification.

7. Relief Requested

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court:

1. Enter an order disqualifying the Honorable Judge Patricia Muscarella from presiding over any further proceedings in this case.

2. Reassign this case to a different judge as provided under the rules governing the Sixth Judicial Circuit in Florida.

VERIFICATION

I, Christopher Gleason, hereby verify that the facts stated in this motion are true and correct to the best of my knowledge and belief.

Respectfully submitted,

/s/ Christopher Gleason

Christopher Gleason

1628 Sand Key Estates Court

Clearwater, FL 33767

727-480-2059

gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via email on this September 19, 2024 to: JARED N. KAHN, ESQ., Attorney for Defendant Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections, at jkahn@pinellas.gov and eservice@pinellas.gov and to JEFFREY N. KLEIN, ESQ., Attorney for Defendant Pinellas County Canvassing Board, at jklein@pinellas.gov and eservice@pinellas.gov.

JARED D. KAHN

Florida Bar Number 105276

Senior Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, Sixth Floor

Clearwater, FL 33756

Primary e-mail address: jkahn@pinellas.gov

Secondary e-mail address: eservice@pinellas.gov

Attorney for Julie Marcus, in her official capacity as

Pinellas County Supervisor of Elections

JEFFREY N. KLEIN
Florida Bar Number 1025117
Assistant County Attorney
Pinellas County Attorney's Office
315 Court Street, 6th Floor.
Clearwater, FL 33756
Tel: 727-464-3354/Fax: 727-464-4147
Primary e-mail address: jklein@pinellas.gov
Secondary e-mail address: eservice@pinellas.gov
Attorney for Defendant, Attorney for the Pinellas
County Canvassing Board

/s/ Christopher Gleason

Dated: 09/19/2024

Filing # 207253493 E-Filed 09/19/2024 12:05:15 PM

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON,

Plaintiff,

vs. Case No. 24-003995-CI

JULIE MARCUS, et al

Defendant.

_____/

PLAINTIFF'S VERIFIED MOTION TO DISQUALIFY
JUDGE PATRICIA MUSCARELLA

COMES NOW, Plaintiff Christopher Gleason, pro se, and pursuant to Rule 2.330 of the Florida Rules of Judicial Administration, respectfully moves this Court to enter an order disqualifying the Honorable Judge Patricia Muscarella from presiding over the above-captioned matter, case pursuant to Rule 2.330 of the Florida Rules of Judicial Administration and in support thereof states as follows:

1. Introduction

This motion is filed in good faith based upon facts and circumstances that would lead a reasonable person to fear that they would not receive a fair and impartial hearing or trial if Judge Muscarella continues to preside over this case.

2. Background

ELECTRONICALLY FILED 09/19/2024 12:05:15 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Plaintiff has been engaged in litigation against the Pinellas County Supervisor of Elections concerning allegations of unlawful concealment, delay, and alteration of public records and election records including Election Summary Reports, Precinct Summary Reports, illegal requests for vote by mail ballots, ballots being illegally and fraudulently cast and the illegal administration and illegal certification of elections using voting systems with no valid or legal certification in violation of Florida's Public Records Laws, Florida Election Code, Federal Election Code and election transparency requirements. In Case No. 23-6698, Judge Muscarella's repeated failure to rule on critical motions—particularly motions for judicial notice and discovery—combined with her failure to address serious irrefutable claims of voter disenfranchisement through the omission of thousands of blank ballots, has resulted in a well-grounded fear that Judge Muscarella cannot provide an impartial and fair hearing. Plaintiff is once again representing himself as a pro se litigant, but the ongoing issues in the present case are compounded by new evidence that suggests the Pinellas County Supervisor of Elections engaged in similar misconduct during the administration of the 2010 judicial election of Judge Patricia Muscarella. These allegations create an additional, direct conflict of interest.

3. Legal Standard

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impartiality might reasonably be questioned. In this case, the combination of Judge Muscarella's prior failure to rule fairly on motions, her unfair treatment of a pro se litigant, and the direct conflict arising from the administration of her own 2010 election by the same Supervisor of Elections, clearly meets the legal standard for recusal. In Livingston v. State, 441 So. 2d 1083 (Fla. 1983), the Florida Supreme Court held that the test for judicial disqualification is whether a reasonably prudent person, knowing all the facts, would have a reasonable fear of not receiving a fair trial. Here, the totality of the circumstances, including the conflict involving Judge Muscarella's election and the pattern of her conduct in the prior case, fully supports recusal.

4. Facts Supporting Disqualification

The following facts, known to the undersigned, support a well-founded fear that the Judge is biased or prejudiced against the Plaintiff:

a. Plaintiff filed a motion for judicial notice, requesting the Court to acknowledge statutory requirements regarding the Supervisor of Elections' duties under Florida law, including the obligation to provide complete, unredacted and unaltered public records and official election records. Judge Muscarella failed to rule on this motion, depriving Plaintiff of the ability to have these fundamental legal points acknowledged by the Court.

b. In connection with Plaintiff's allegations of voter disenfranchisement through blank ballots and omissions in the election summary reports also known as the EL45A reports and the precinct level election reports also known as the EL30A reports, Plaintiff sought discovery to obtain critical evidence of the Supervisor of Elections' conduct. Judge Muscarella did not rule on the motion for discovery, effectively blocking Plaintiff from gathering evidence essential to proving his claims. This failure to allow full discovery was particularly prejudicial to Plaintiff,

who was acting pro se at the time and was disadvantaged in navigating complex procedural matters.

c. Plaintiff, previously a pro se litigant, was subject to unfair treatment during the earlier proceedings, in which Judge Muscarella failed to rule on essential motions and disregarded significant claims involving voter disenfranchisement and public records concealment and alteration by the Pinellas County Supervisor of Elections.

d. The Plaintiff, as a pro se litigant is bringing a contest of election challenge based on fraud, official misconduct, corrupt practices and further violations of the Florida Constitution, the United State Constitution, Florida Election Statutes, Federal Election Statutes, and now brings this motion in light of serious concerns regarding the administration of Judge Muscarella's own 2010 election by the Pinellas County Supervisor of Elections, implicating a conflict of interest.

e. Plaintiff filed a motion for judicial notice, requesting the Court to acknowledge statutory requirements regarding the Supervisor of Elections' duties under Florida law, including the obligation to provide complete, unredacted and unaltered public records and official election records. Judge Muscarella failed to rule on this motion, depriving Plaintiff of the ability to have these fundamental legal points acknowledged by the Court.

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h. The Pinellas County Circuit Court's procedural delays and Judge Muscarella's refusal to allow discovery and take judicial notice effectively denied Plaintiff access to the evidence needed to substantiate his claims, while favoring the defense's arguments, including accepting without scrutiny the defense counsel's fraudulent misrepresentation regarding the statutory requirements for election reports. This unfair treatment of a pro se litigant raises serious ethical concerns under Florida's judicial canons.

i. Compounding these concerns is the fact that the issues being litigated in the current case involve similar allegations of unlawful election practices by the Supervisor of Elections that implicate the administration of the 2010 judicial election of Judge Patricia Muscarella. Plaintiff has obtained evidence indicating that the same practices involving the concealment of public records, the unlawful administration of elections using electronic voting systems that have modems attached voiding their certification and the failure to properly report voter data—including blank ballots, and vote by mail fraud—were employed during the election in which Judge Muscarella was elected.

j. This creates an inherent conflict of interest, as Judge Muscarella's impartiality is now in question, given that the allegations in this case directly relate to the actions of the Pinellas County Supervisor of Elections in administering her own election. A reasonable person, aware of these facts, would have a well-founded fear that Judge Muscarella cannot be impartial in ruling on a case that involves misconduct by the very office that oversaw her election.

5. Fear of Bias

Based on these facts, the undersigned genuinely fears that they will not receive a fair and impartial hearing or trial due to the judge's actions, statements, or relationships.

6. Timeliness

This motion is filed timely and within ten (10) days of discovering the facts that give rise to the fear of prejudice. Under Rule 2.330(e), the motion must be filed immediately upon discovery of the grounds for disqualification.

7. Relief Requested

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court:

1. Enter an order disqualifying the Honorable Judge Patricia Muscarella from presiding over any further proceedings in this case.

2. Reassign this case to a different judge as provided under the rules governing the Sixth Judicial Circuit in Florida.

VERIFICATION

I, Christopher Gleason, hereby verify that the facts stated in this motion are true and correct to the best of my knowledge and belief.

Respectfully submitted,

/s/ Christopher Gleason

Christopher Gleason

1628 Sand Key Estates Court

Clearwater, FL 33767

727-480-2059

gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via email on this September 19, 2024 to: JARED N. KAHN, ESQ., Attorney for Defendant Julie Marcus,

in her official capacity as Pinellas County Supervisor of Elections, at jkahn@pinellas.gov and

eservice@pinellas.gov and to JEFFREY N. KLEIN, ESQ., Attorney for Defendant Pinellas

County Canvassing Board, at jklein@pinellas.gov and eservice@pinellas.gov.

JARED D. KAHN

Florida Bar Number 105276

Senior Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, Sixth Floor

Clearwater, FL 33756

Primary e-mail address: jkahn@pinellas.gov

Secondary e-mail address: eservice@pinellas.gov

Attorney for Julie Marcus, in her official capacity as

Pinellas County Supervisor of Elections

JEFFREY N. KLEIN
Florida Bar Number 1025117
Assistant County Attorney
Pinellas County Attorney's Office
315 Court Street, 6th Floor.
Clearwater, FL 33756
Tel: 727-464-3354/Fax: 727-464-4147
Primary e-mail address: jklein@pinellas.gov
Secondary e-mail address: eservice@pinellas.gov
Attorney for Defendant, Attorney for the Pinellas
County Canvassing Board

/s/ Christopher Gleason

Dated: 09/19/2024

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON,

Plaintiff,

vs. **Case No.: 24-003995-CI**

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections and PINELLAS COUNTY CANVASSING BOARD,

Defendants.
_____/

ORDER DENYING PLAINTIFF'S VERIFIED MOTION TO DISQUALIFY JUDGE PATRICIA MUSCARELLA

THIS MATTER came before the Court on September 19, 2024, on Plaintiff's Motion to Disqualify Judge Patricia Muscarella. Having considered the motion, the case file, the applicable law, and being otherwise fully advised in the premises, the Court hereby

FINDS AND ORDERS:

that the Motion to Disqualify is legally insufficient.

Accordingly, it is

ORDERED AND ADJUDGED that Plaintiff's Verified Motion to Disqualify Judge Patricia Muscarella is **DENIED.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 19th day of September 2024. A true and correct copy of the foregoing has been furnished to the parties listed below.

24-003995-CI 9/19/2024 1:27:43 PM
Circuit Judge Patricia A. Muscarella
24-003995-CI 9/19/2024 1:27:43 PM

Honorable Patricia Muscarella
Circuit Civil Judge

ELECTRONICALLY FILED 9/19/2024 1:27:43 PM KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Copies furnished to:

Christopher Gleason
1628 Sand Key Estates Court
Clearwater, FL 33767
gleasonforpinellas@gmail.com
Pro Se Plaintiff

Julie Marcus
c/o Jared D. Khan, Esq.
Pinellas County Attorney's Office
315 Court Street, Sixth Floor
Clearwater, FL 33756
Defendant

Pinellas County Canvassing Board
c/o Jeffrey N. Klein, Esq.
Pinellas County Attorney's Office
315 Court Street, Sixth Floor
Clearwater, FL 33756

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON,

Plaintiff,

vs. **Case No.: 24-003995-CI**

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et. al.,

Defendants.
_____/

ORDER DENYING PLAINTIFF'S RENEWED MOTION FOR RECUSAL/DISQUALIFICATION OF JUDGE PATRICIA MUSCARELLA PURSUANT TO SECTION 38.10, FLORIDA STATUTES

THIS MATTER is before the Court on Plaintiff's Renewed Motion for Recusal/Disqualification of Judge Patricia Muscarella Pursuant to Section 38.10, Florida Statutes ("Motion") dated October 21, 2024. Having considered the Motion, the case file, the applicable law, and being otherwise fully advised in the premises, the Court hereby

FINDS AND ORDERS:

The Motion is legally insufficient. *See* Fla. R. Gen. Prac. & Jud. Admin. 2.330(d).

Accordingly, it is

ORDERED AND ADJUDGED that Plaintiff's Motion is **DENIED.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 22nd day of October 2024. A true and correct copy of the foregoing has been furnished to the parties listed below.

24-003995-CI 10/22/2024 11:08:08 AM
Circuit Judge Patricia A. Muscarella
~~24-003995-CI 10/22/2024 11:08:08 AM~~
Honorable Patricia A. Muscarella
Circuit Civil Judge

ELECTRONICALLY FILED 10/22/2024 11:08:08 AM KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Copies furnished to:

Christopher Gleason
1628 Sand Key Estates Court
Clearwater, FL 33767
gleasonforpinellas@gmail.com
Pro Se Plaintiff

Jared D. Kahn, Esq.
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315 Court St.
Floor 6
Clearwater, FL 33756
jkahn@pinellascounty.org
eservice@pinellascounty.org
Counsel for Defendant, Julie Marcus

Jeffrey Klein Esq.
Pinellas County Attorney's Office
315 Court St.
Floor 6
Clearwater, FL 33756
jklein@pinellascounty.org
eservice@pinellascounty.org
Counsel for Defendant, Pinellas County Canvassing Board

DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
SECOND DISTRICT
1700 N. Tampa Street, Suite 300, Tampa FL 33602

May 1, 2025

CHRISTOPHER GLEASON,
APPELLANT(S)
V.

JULIE MARCUS, IN HER OFFICIAL CAPACITY AS PINELLAS COUNTY SUPERVISOR OF ELECTIONS, ET AL.,
APPELLEE(S).

CASE NO.: 2D2024-2688
L.T. No.: 522024CA003995XXCICI

BY ORDER OF THE COURT:

Appellant's "Emergency motion to disqualify judges Nelly N. Khouzam, Morris Silberman, Craig C. Villanti, Anthony K. Black, Edward C. LaRose, and Susan H. Rothstein-Youakim, to vacate conflicted rulings, for stay of proceedings, and for coordination of related cases," "Motion to disqualify Judge Nelly N. Khouzam," "Motion to Disqualify Judge Morris Silberman," and "Motion to vacate all orders issued by disqualified judges based on structural errors and void judicial acts" filed in cases 2D2024-2687 and 2D2024-2688 are denied.

I HEREBY CERTIFY that the foregoing is a true copy of the original court order.

Mary Elizabeth Kuenzel
Mary Elizabeth Kuenzel, Clerk
2D2024-2688 5/1/25

JR

Served:
PINELLAS CLERK
CHRISTOPHER GLEASON
JARED DOUGLAS KAHN
JEFFREY KLEIN
KELLY LYNN VICARI

Filing # 209218197 E-Filed 10/21/2024 02:16:32 PM

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON,

Plaintiff,

CASE NO.: 24-003995-CI
UCN: 522024CA003995XXCICI

v.

JULIE MARCUS, in her personal and official capacity as Pinellas County Supervisor of Elections; and the **CANVASSING BOARD OF PINELLAS COUNTY**,

Defendants.

_____/

PLAINTIFF'S RENEWED NOTICE AND MOTION FOR RECUSAL/DISQUALIFICATION OF JUDGE PATRICIA MUSCARELLA PURSUANT TO SECTION 38.10, FLORIDA STATUTES

COMES NOW the Plaintiff, Christopher Gleason, appearing pro se, and hereby moves this Honorable Court for the recusal/disqualification of Judge Patricia Muscarella from presiding over this case pursuant to Section 38.10, Florida Statutes, and Rule 2.330 of the Florida Rules of General Practice and Judicial Administration. In support of this Motion, Plaintiff submits the following:

I. LEGAL BASIS FOR RECUSAL/DISQUALIFICATION

ELECTRONICALLY FILED 10/21/2024 02:16:31 PM: KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

1. Section 38.10, Florida Statutes states:

> "Whenever a party makes and files an affidavit stating fear that the party will not receive a fair trial on account of the prejudice of the judge, the judge shall proceed no further, but another judge shall be designated."

- The statutory mandate is unequivocal. When a party's affidavit alleges fear of prejudice, and it is legally sufficient, the presiding judge must cease further proceedings and transfer the case to another judge. The standard for sufficiency is grounded not in proof of actual prejudice but in the appearance of potential bias.

2. Florida Rule of General Practice and Judicial Administration 2.330 dictates that:

- A motion for disqualification must be granted if a reasonably prudent person in the movant's position would fear not receiving a fair and impartial trial before the assigned judge. The motion and accompanying affidavit(s) need only be "legally sufficient," a standard satisfied when the motion sets forth facts that, if true, would place a reasonable person in fear of judicial bias.

II. FACTUAL BASIS SUPPORTING DISQUALIFICATION

3. Plaintiff's fear that Judge Muscarella is prejudiced is well-founded, substantiated by his own sworn affidavit and corroborated by sworn affidavits from five witnesses. These affidavits establish a consistent pattern of judicial conduct that demonstrates actual bias or, at minimum, the appearance thereof.

III. GROUNDS FOR DISQUALIFICATION

A. Repeated Failure to Rule on Critical Motions:

- Judge Muscarella has consistently failed to rule on Plaintiff's motions for judicial notice, discovery, and other critical motions necessary to the litigation of this case. Florida jurisprudence establishes that undue delay or failure to rule on motions constitutes a denial of due process. As held in *State ex rel. Davis v. Parks*, 141 So. 2d 638 (Fla. 1932), justice delayed is justice denied, and such delays cast doubt on the impartiality and efficiency of the judiciary.

B. Evidence of Conflict of Interest:

- Plaintiff has obtained evidence indicating that the Pinellas County Supervisor of Elections engaged in similar electoral improprieties during Judge Muscarella's 2010 judicial election. This creates an irrefutable conflict of interest. As noted in *State ex rel. Mickler v. Rowe*, 126 So. 2d 129 (Fla. 1960), a judge must recuse themselves when an appearance of bias or impropriety exists. The conflict is not merely hypothetical but grounded in Plaintiff's evidence, demonstrating Judge Muscarella's potential vested interest in protecting the Defendant.

C. Improper Reliance on Defense Counsel's Representations:

- On September 19, 2024, Judge Muscarella admitted unfamiliarity with relevant election law and sought guidance from defense counsel, Mr. Jared Kahn, on how to proceed. This reliance on defense counsel's guidance over Plaintiff's arguments contravenes the judicial duty of impartiality, as articulated in *The Florida Bar v. Cox*, 794 So. 2d 1278 (Fla. 2001). The impartial role of a judge requires independent evaluation of the law, not deferring to one party's counsel.

D. Acceptance of Misrepresentations Without Verification:

- Defense counsel falsely claimed that Exhibit G contained information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the information being widely accessible online. Judge Muscarella accepted this misrepresentation without requiring proof. In *Holloway v. State*, 342 So. 2d 966 (Fla. 1st DCA 1977), the court held that uncritically accepting one party's assertions is indicative of prejudice.

E. Disparate Treatment of Pro Se Litigant:

- The Florida judiciary recognizes the rights of pro se litigants to be treated fairly and ***equitably (Platel v. Maguire, Voorhis & Wells, P.A., 436 So. 2d 303 (Fla. 5th DCA 1983))***. Judge Muscarella's consistent deference to defense counsel and disregard for Plaintiff's arguments exhibits a clear bias against the Plaintiff as a self-represented litigant.

F. Prohibition on Recording Court Proceedings:

- Judge Muscarella's prohibition of recording court hearings is contrary to the principles of transparency mandated by ***In re Petition of Post-Newsweek Stations, Florida, Inc., 370 So. 2d 764 (Fla. 1979)***. The absence of any valid basis for this restriction raises concerns about transparency and impartiality.

G. Excessive Sealing of Exhibits:

- The Florida Constitution, Article I, Section 24, and Chapter 119 of the Florida Statutes emphasize transparency and open government. Judge Muscarella's order to seal all exhibits without using the least restrictive means violates Rule 2.420, Florida Rules of General Practice and Judicial Administration, and raises further concerns about her impartiality. As ruled in ***Barron v. Florida Freedom***

Newspapers, Inc., 531 So. 2d 113 (Fla. 1988), excessive secrecy is inimical to the public interest.

IV. AFFIDAVITS IN SUPPORT OF MOTION

4. Plaintiff's Affidavit is attached hereto, setting forth detailed facts substantiating the claim of bias and prejudice.

5. Affidavits of Five Witnesses are attached, corroborating Plaintiff's assertions of judicial bias and confirming specific incidents that exemplify Judge Muscarella's partiality.

- Each affidavit attests to observations of Judge Muscarella's statements, rulings, demeanor, and conduct that display a clear bias against Plaintiff, as well as her overt favoritism toward defense counsel, Mr. Jared Kahn.

V. LEGAL ANALYSIS

6. Florida courts have consistently upheld that a judge must be disqualified where there is an objectively reasonable fear of bias. The Plaintiff's allegations, supported by multiple sworn affidavits, provide ample grounds for such fear.

- ***In MacKenzie v. Super Kids Bargain Store, Inc., 565 So. 2d 1332 (Fla. 1990)***, the Florida Supreme Court reaffirmed that disqualification is appropriate where a party harbors a well-founded fear of not receiving a fair trial, even in the absence of proven actual bias.

- In ***Livingston v. State, 441 So. 2d 1083 (Fla. 1983)***, the Court held that the appearance of justice must be maintained, stating, "It is the very essence of a fair trial that the judge be impartial and that there be an appearance of impartiality."

VI. CONCLUSION

7. Based on the detailed facts and legal authorities presented, it is evident that Judge Patricia Muscarella's continued involvement in this case would undermine Plaintiff's constitutional right to a fair and impartial trial.

8. The facts, when viewed objectively, establish a reasonable fear of prejudice that warrants the immediate disqualification of Judge Muscarella under Section 38.10, Florida Statutes, and Rule 2.330 of the Florida Rules of General Practice and Judicial Administration.

WHEREFORE, Plaintiff respectfully requests that:

1. This Honorable Court GRANT Plaintiff's Motion for Recusal/Disqualification.

2. This matter be reassigned to another judge who can ensure the fair, impartial, and just adjudication of Plaintiff's claims.

CERTIFICATE OF GOOD FAITH

I, Christopher Gleason, certify that this motion is made in good faith and not for purposes of delay. The facts presented are true to the best of my knowledge and belief, and I genuinely fear that I will not receive a fair trial if Judge Muscarella continues to preside.

Respectfully submitted,

/s/ Christopher Gleason

Christopher Gleason

1628 Sand Key Estates Court

Clearwater, FL 33767

727-480-2059

gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via email on this October 1, 2024 to: JARED N. KAHN, ESQ., Attorney for Defendant Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections, Dustin Chase in his official capacity as the Deputy Supervisor of Elections and Matt Smith in his official capacity as General Counsel for the Pinellas County Supervisor of Elections, at jkahn@pinellas.govand eservice@pinellas.gov and to KELLY L. VICARI, Attorney for Defendant Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections, Dustin Chase in his official capacity as the Deputy Supervisor of Elections and Matt Smith in his official capacity as General Counsel for the Pinellas County Supervisor of Elections, at kvicari@pinellas.gov and eservice@pinellas.gov .

JARED D. KAHN

Florida Bar Number 105276

Senior Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, Sixth Floor

Clearwater, FL 33756

Primary e-mail address: jkahn@pinellas.gov

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Attorney for Julie Marcus, in her official capacity as

Pinellas County Supervisor of Elections

KELLY L. VICARI

FBN: 88704

Assistant County Attorney

Pinellas County Attorney's Office

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Florida Bar Number 1025117

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315 Court Street, 6th Floor.

Clearwater, FL 33756

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Primary e-mail address: jklein@pinellas.gov

Secondary e-mail address: eservice@pinellas.gov

Attorney for Defendant, Attorney for the Pinellas

County Canvassing Board

/s/ Christopher Gleason

Dated: 09/23/2024

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON,

Plaintiff,

CASE NO.: 24-003995-CI
UCN: 522024CA003995XXCICI

v.

JULIE MARCUS, in her personal and official capacity as Pinellas County Supervisor of Elections; and the **CANVASSING BOARD OF PINELLAS COUNTY**,

Defendants.

AFFIDAVIT OF CHRISTOPHER GLEASON IN SUPPORT OF RENEWED MOTION FOR DISQUALIFICATION

STATE OF FLORIDA
COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared CHRISTOPHER GLEASON, who, being first duly sworn, deposes and states as follows:

1. My name is Christopher Gleason, and I am the Plaintiff in the above-captioned case currently pending before the Circuit Court of the Sixth Judicial Circuit in and for Pinellas County, Florida.

2. I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and belief.

3. I have a well-founded fear that I will not receive a fair trial in this case due to the demonstrated bias and prejudice of the presiding judge, the Honorable Judge Muscarella. This fear is reasonable and based on the following facts and circumstances:

A. Reliance on Defense Counsel's Misrepresentations

4. Throughout the proceeding, Judge Muscarella has consistently relied on the representations and arguments made by defense counsel, Mr. Jared Kahn, without independent verification or examination of the accuracy and legal validity of these statements.

5. Specifically, defense counsel misrepresented the legal status of Exhibit G by claiming that it contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d). Despite there being no valid basis or supporting evidence for such a claim, Judge Muscarella accepted these assertions without requiring defense counsel to provide proof or further clarification.

6. By adopting the defense counsel's misrepresentations, Judge Muscarella has shown a lack of impartiality and a predisposition to favor the defense's position, thereby undermining my confidence in her ability to preside over this case fairly and without bias.

B. Disregard for My Rights as a Pro Se Litigant

7. I am representing myself in this matter as a pro se litigant, which places me at a disadvantage compared to the represented defendants. It is my understanding that as a pro se litigant, I am entitled to the same fair treatment, consideration, and

protection of my rights as any other party appearing before the court, regardless of whether I have legal representation.

8. Despite this, Judge Muscarella has demonstrated a consistent pattern of favoring the defense's arguments and legal positions while disregarding or dismissing my legitimate legal arguments and evidence.

9. On multiple occasions, Judge Muscarella sought guidance and clarification from defense counsel regarding legal procedures and the interpretation of the law. This conduct suggests that Judge Muscarella is improperly relying on defense counsel's advice to guide the proceedings, rather than independently evaluating the issues and ensuring that both parties receive equal and fair treatment under the law.

10. The court's deference to defense counsel has created an imbalance in the proceedings and a well-founded fear that Judge Muscarella is not providing me, as a pro se litigant, the fair and impartial trial to which I am entitled under Florida law.

C. Unjustified Prohibition on Recording Court Proceedings

11. During the course of these proceeding, Judge Muscarella issued an order prohibiting the recording of court hearings, without providing any valid legal basis or compelling justification for such a restriction.

12. As a pro se litigant, I rely on the ability to record court proceedings to ensure that I have an accurate record of the hearings, which is essential for preserving my right to appeal or seek review of any adverse rulings. The prohibition on recording has significantly hindered my ability to protect my legal interests and maintain an accurate record of these proceedings.

13. The Florida Supreme Court has held that court proceedings should be open to the public and that recording should be permitted unless there is a compelling reason to restrict it ***(*In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979))***. Judge Muscarella's prohibition on recording, without a valid justification, raises concerns about transparency and suggests an attempt to limit public scrutiny, further contributing to my fear of bias.

D. Appearance of Impropriety and Bias

14. The Florida Supreme Court has made it clear that a judge should be disqualified if the facts create a reasonable fear that a party will not receive a fair trial ***(*MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990))***. The appearance of impropriety, partiality, or favoritism is sufficient grounds for recusal.

15. Based on the totality of the circumstances, including Judge Muscarella's reliance on defense counsel's guidance, disregard for my rights as a pro se litigant, and the unjustified prohibition on recording court proceedings, I have a well-founded fear that Judge Muscarella is biased and unable to preside over this case impartially.

16. Statement of Good Faith

16. I make this affidavit in good faith and not for the purpose of delay. I genuinely fear that I will not receive a fair and impartial trial if Judge Muscarella continues to preside over this case.

WHEREFORE, I respectfully request that Judge Muscarella be disqualified from this case pursuant to Section 38.10, Florida Statutes, and that this matter be reassigned to another judge who can ensure that I receive a fair and impartial trial.

FURTHER AFFIANT SAYETH NAUGHT.

Dated this 29 day of September, 2024

Christopher Gleason

Plaintiff

NOTARY ACKNOWLEDGMENT

STATE OF FLORIDA

COUNTY OF PINELLAS

SWORN TO and subscribed before me this 29th day of Sept, 2024, by Christopher Gleason, who is personally known to me or who has produced FL Drivers License as identification.

Notary Public

State of Florida

My Commission Expires: [insert date]

[Seal]

NOTARY PUBLIC STATE OF FLORIDA

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF Regina Hansen

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Regina Hansen who, being first duly sworn, deposes and states as follows:

1. My name is Regina Hansen, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9-19-24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

R Hansen
Witness Name Regina Hansen
Address 2427 Finlandia Ln Apt 41, Clearwater, FL 33763
Phone Number 727-788-2772

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Christine Peters
Notary Public, State of Florida

My Commission Expires: _____

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF RICHARD GREENWOOD

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared RICHARD GREENWOOD, who, being first duly sworn, deposes and states as follows:

1. My name is RICHARD GREENWOOD, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9/19/24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

RMG

Witness Name RICHARD GREENWOOD
Address 105 HARBOR BLUFF DR.
Phone Number 951-375-9683

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Christine Peters
Notary Public, State of Florida

My Commission Expires: _____

NOTARY PUBLIC STATE OF FLORIDA
CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF Keith L. Eshelman

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Keith L. Eshelman who, being first duly sworn, deposes and states as follows:

1. My name is Keith L. Eshelman, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on Sept. 19, 2024, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

D. Appearance of Impropriety and Bias

12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*; 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

Keith L. Eshelman

Witness Name Keith L. Eshelman
Address 2430 Brazilia Dr #4, Clearwater, FL 33763
Phone Number 813-949-7583

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Christine Peters

Notary Public, State of Florida My Commission Expires: 2/26/28

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF Krista Kosier

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared Krista Kosier who, being first duly sworn, deposes and states as follows:

1. My name is Krista Kosier, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9/19/24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

A. Judge Muscarella's Reliance on Defense Counsel's Legal Guidance

4. During the proceedings, I witnessed Judge Muscarella repeatedly seek guidance and clarification from defense counsel, Mr. Jared Kahn, regarding legal procedures

and interpretations of the law. On multiple occasions, the judge asked Mr. Kahn for his opinion on how to proceed, and she appeared to rely on his statements without independent verification or consideration of the Plaintiff's arguments.

5. Specifically, Judge Muscarella accepted Mr. Kahn's representation that Exhibit G contained critical infrastructure information protected under Florida Statutes §§ 119.0725(2)(b) and (d), despite the absence of any statutory basis or evidence provided to support this claim. Judge Muscarella did not question or challenge Mr. Kahn's statements, even though Plaintiff Christopher Gleason attempted to raise concerns and objections regarding the accuracy of the defense counsel's assertions.

6. In my opinion, Judge Muscarella's reliance on Mr. Kahn's guidance demonstrated a lack of impartiality and an appearance of bias in favor of the defense. This behavior suggested that the judge was not acting as a neutral arbiter but rather as someone influenced by the defendant's legal counsel.

B. Failure to Provide Fair Treatment to Pro Se Plaintiff

7. I was aware that Christopher Gleason was representing himself as a pro se litigant, and I observed that Judge Muscarella did not extend the same level of consideration or assistance to him as she did to the defense counsel. While Mr. Kahn was given ample opportunity to present his arguments and legal positions, Judge Muscarella frequently interrupted or dismissed Mr. Gleason's attempts to raise legal points or address issues related to the case.

8. There were several instances where Judge Muscarella appeared impatient or dismissive when Mr. Gleason tried to present his arguments, whereas she showed deference and attentiveness to defense counsel's submissions. This unequal treatment gave me the impression that Judge Muscarella was biased against Mr.

Gleason and was not providing him with the fair and equal opportunity to present his case.

9. I am aware, based on my knowledge of the law, that judges have a duty to ensure that pro se litigants are treated fairly and are not disadvantaged simply because they do not have legal representation. In this case, Judge Muscarella failed to uphold this duty, which raised concerns about her ability to preside impartially over the proceedings.

C. Unjustified Prohibition on Recording Court Proceedings

10. During the proceedings, Judge Muscarella issued an order prohibiting the recording of the hearings, without providing a valid legal basis or compelling justification for this restriction. I found this decision troubling, as it limited the transparency of the court proceedings and prevented Mr. Gleason from maintaining an accurate record of what transpired, which is crucial for a pro se litigant who may need to rely on such a record for appeals or further legal action.

11. The prohibition on recording was not consistent with the principles of open and public judicial proceedings as established by the Florida Supreme Court in *In re Petition of Post-Newsweek Stations, Florida, Inc.*, 370 So. 2d 764 (Fla. 1979), which emphasizes the importance of transparency and the public's right to access court proceedings. Judge Muscarella's decision to prevent recording appeared to serve no purpose other than to limit scrutiny, reinforcing my perception that Mr. Gleason was not being treated fairly.

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12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

interpretations, her disregard for Mr. Gleason's rights as a pro se litigant, and her decision to prohibit recordings created an environment where it was evident that the Plaintiff was not receiving a fair trial.

13. In my opinion, a reasonably prudent person observing the proceedings would have serious concerns about Judge Muscarella's impartiality and would fear that Christopher Gleason could not receive a fair and impartial trial. The judge's conduct violated the principles of judicial fairness and impartiality and was inconsistent with the standards expected of a judge as articulated in *MacKenzie v. Super Kids Bargain Store, Inc.*, 565 So. 2d 1332 (Fla. 1990), which emphasizes that even the appearance of bias or impropriety is sufficient to warrant a judge's disqualification.

E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

Witness Name Krista Kosier
Address 13302 Whispering Palms Pl SW #1202, Largo FL 33774
Phone Number (727) 798-0972

Sworn to and subscribed before me this 29th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Notary Public, State of Florida My Commission Expires: 2-26-28

NOTARY PUBLIC STATE OF FLORIDA
CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

AFFIDAVIT OF SIRENA PELLARDO

REGARDING JUDGE MUSCARELLA'S IMPARTIALITY

STATE OF FLORIDA

COUNTY OF PINELLAS

BEFORE ME, the undersigned authority, personally appeared _____, who, being first duly sworn, deposes and states as follows:

1. My name is SIRENA PELLARDO, and I am over the age of 18, competent to testify, and make this affidavit based on my personal knowledge and observations.

2. I am not a party to the above-captioned case involving Plaintiff Christopher Gleason and Defendant Julie Marcus, nor do I have any personal interest in the outcome of this litigation. I attended the court proceedings involving this case as an observer on 9-19-24, and my observations are based on what I personally witnessed during these proceedings.

3. I observed the conduct and demeanor of Judge Patricia Muscarella during the court proceedings, and I have a well-founded belief that she did not act impartially and that Plaintiff Christopher Gleason was not treated fairly due to the judge's demonstrated bias and favoritism toward the defendant and their legal counsel, Mr. Jared Kahn.

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12. Based on my observations, it is my belief that Judge Muscarella's conduct throughout the proceedings demonstrated a clear appearance of bias and impropriety. The combination of her reliance on defense counsel's legal

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E. Statement of Good Faith

14. I make this affidavit in good faith and not for any improper purpose. I am providing this testimony to support the Plaintiff's efforts to seek a fair and impartial trial before a judge who can objectively and fairly adjudicate this matter.

FURTHER AFFIANT SAYETH NAUGHT.

Witness Name SIRENIA PENARO JR CIRCLE
Address 214 DOGWOOD
Phone Number 619-389-8939

Sworn to and subscribed before me this 19th day of Sept, 2024.

Personally known ✓ OR Produced Identification ___.
Type of Identification Produced: _____

Notary Public, State of Florida

My Commission Expires: 2-26-28

CHRISTINE PETERS
Commission # HH 496653
Expires February 26, 2028

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA

CHRISTOPHER GLEASON,

Plaintiff,

vs. Case No. 24-003995-CI

JULIE MARCUS, et al

Defendant.

_____/

PLAINTIFF'S VERIFIED MOTION TO DISQUALIFY
JUDGE PATRICIA MUSCARELLA

COMES NOW, Plaintiff Christopher Gleason, pro se, and pursuant to Rule 2.330 of the Florida Rules of Judicial Administration, respectfully moves this Court to enter an order disqualifying the Honorable Judge Patricia Muscarella from presiding over the above-captioned matter, case pursuant to Rule 2.330 of the Florida Rules of Judicial Administration and in support thereof states as follows:

1. Introduction

This motion is filed in good faith based upon facts and circumstances that would lead a reasonable person to fear that they would not receive a fair and impartial hearing or trial if Judge Muscarella continues to preside over this case.

2. Background

Plaintiff has been engaged in litigation against the Pinellas County Supervisor of Elections concerning allegations of unlawful concealment, delay, and alteration of public records and election records including Election Summary Reports, Precinct Summary Reports, illegal requests for vote by mail ballots, ballots being illegally and fraudulently cast and the illegal administration and illegal certification of elections using voting systems with no valid or legal certification in violation of Florida's Public Records Laws, Florida Election Code, Federal Election Code and election transparency requirements. In Case No. 23-6698, Judge Muscarella's repeated failure to rule on critical motions—particularly motions for judicial notice and discovery—combined with her failure to address serious irrefutable claims of voter disenfranchisement through the omission of thousands of blank ballots, has resulted in a well-grounded fear that Judge Muscarella cannot provide an impartial and fair hearing. Plaintiff is once again representing himself as a pro se litigant, but the ongoing issues in the present case are compounded by new evidence that suggests the Pinellas County Supervisor of Elections engaged in similar misconduct during the administration of the 2010 judicial election of Judge Patricia Muscarella. These allegations create an additional, direct conflict of interest.

3. Legal Standard

Rule 2.330(d)(1) of the Florida Rules of Judicial Administration states that a judge should be disqualified when the party fears that they will not receive a fair trial or hearing because of specifically alleged facts. The fear must be objectively reasonable. Under Canon 2A of the Florida Code of Judicial Conduct, judges must act at all times in a manner that promotes public confidence in the integrity and impartiality of the judiciary. Canon 3B(7) requires judges to rule on all matters promptly and fairly, which Judge Muscarella failed to do by not addressing critical motions in the prior case. Furthermore, Canon 3E(1) mandates recusal where a judge's

impartiality might reasonably be questioned. In this case, the combination of Judge Muscarella's prior failure to rule fairly on motions, her unfair treatment of a pro se litigant, and the direct conflict arising from the administration of her own 2010 election by the same Supervisor of Elections, clearly meets the legal standard for recusal. In Livingston v. State, 441 So. 2d 1083 (Fla. 1983), the Florida Supreme Court held that the test for judicial disqualification is whether a reasonably prudent person, knowing all the facts, would have a reasonable fear of not receiving a fair trial. Here, the totality of the circumstances, including the conflict involving Judge Muscarella's election and the pattern of her conduct in the prior case, fully supports recusal.

4. Facts Supporting Disqualification

The following facts, known to the undersigned, support a well-founded fear that the Judge is biased or prejudiced against the Plaintiff:

a. Plaintiff filed a motion for judicial notice, requesting the Court to acknowledge statutory requirements regarding the Supervisor of Elections' duties under Florida law, including the obligation to provide complete, unredacted and unaltered public records and official election records. Judge Muscarella failed to rule on this motion, depriving Plaintiff of the ability to have these fundamental legal points acknowledged by the Court.

b. In connection with Plaintiff's allegations of voter disenfranchisement through blank ballots and omissions in the election summary reports also known as the EL45A reports and the precinct level election reports also known as the EL30A reports, Plaintiff sought discovery to obtain critical evidence of the Supervisor of Elections' conduct. Judge Muscarella did not rule on the motion for discovery, effectively blocking Plaintiff from gathering evidence essential to proving his claims. This failure to allow full discovery was particularly prejudicial to Plaintiff,

who was acting pro se at the time and was disadvantaged in navigating complex procedural matters.

c. Plaintiff, previously a pro se litigant, was subject to unfair treatment during the earlier proceedings, in which Judge Muscarella failed to rule on essential motions and disregarded significant claims involving voter disenfranchisement and public records concealment and alteration by the Pinellas County Supervisor of Elections.

d. The Plaintiff, as a pro se litigant is bringing a contest of election challenge based on fraud, official misconduct, corrupt practices and further violations of the Florida Constitution, the United State Constitution, Florida Election Statutes, Federal Election Statutes, and now brings this motion in light of serious concerns regarding the administration of Judge Muscarella's own 2010 election by the Pinellas County Supervisor of Elections, implicating a conflict of interest.

e. Plaintiff filed a motion for judicial notice, requesting the Court to acknowledge statutory requirements regarding the Supervisor of Elections' duties under Florida law, including the obligation to provide complete, unredacted and unaltered public records and official election records. Judge Muscarella failed to rule on this motion, depriving Plaintiff of the ability to have these fundamental legal points acknowledged by the Court.

f. In connection with Plaintiff's allegations of voter disenfranchisement through blank ballots and omissions in the election summary reports also known as the EL45A reports and the precinct level election reports also known as the EL30A reports, Plaintiff sought discovery to obtain critical evidence of the Supervisor of Elections' conduct. Judge Muscarella did not rule on the motion for discovery, effectively blocking Plaintiff from gathering evidence essential to proving his claims. This failure to allow full discovery was particularly prejudicial to Plaintiff,

who was acting pro se at the time and was disadvantaged in navigating complex procedural matters.

g. During the previous proceeding, Plaintiff represented himself pro se and was subject to unfair treatment that further supports the reasonable belief that Judge Muscarella's handling of the case was biased. Courts have a duty to ensure pro se litigants receive fair treatment, yet Judge Muscarella's consistent failure to rule on key motions and to address substantive issues raised by Plaintiff, including substantial claims of voter disenfranchisement, demonstrates a lack of impartiality.

h. The Pinellas County Circuit Court's procedural delays and Judge Muscarella's refusal to allow discovery and take judicial notice effectively denied Plaintiff access to the evidence needed to substantiate his claims, while favoring the defense's arguments, including accepting without scrutiny the defense counsel's fraudulent misrepresentation regarding the statutory requirements for election reports. This unfair treatment of a pro se litigant raises serious ethical concerns under Florida's judicial canons.

i. Compounding these concerns is the fact that the issues being litigated in the current case involve similar allegations of unlawful election practices by the Supervisor of Elections that implicate the administration of the 2010 judicial election of Judge Patricia Muscarella. Plaintiff has obtained evidence indicating that the same practices involving the concealment of public records, the unlawful administration of elections using electronic voting systems that have modems attached voiding their certification and the failure to properly report voter data—including blank ballots, and vote by mail fraud—were employed during the election in which Judge Muscarella was elected.

j. This creates an inherent conflict of interest, as Judge Muscarella's impartiality is now in question, given that the allegations in this case directly relate to the actions of the Pinellas County Supervisor of Elections in administering her own election. A reasonable person, aware of these facts, would have a well-founded fear that Judge Muscarella cannot be impartial in ruling on a case that involves misconduct by the very office that oversaw her election.

5. Fear of Bias

Based on these facts, the undersigned genuinely fears that they will not receive a fair and impartial hearing or trial due to the judge's actions, statements, or relationships.

6. Timeliness

This motion is filed timely and within ten (10) days of discovering the facts that give rise to the fear of prejudice. Under Rule 2.330(e), the motion must be filed immediately upon discovery of the grounds for disqualification.

7. Relief Requested

WHEREFORE, the Plaintiff respectfully requests that this Honorable Court:

1. Enter an order disqualifying the Honorable Judge Patricia Muscarella from presiding over any further proceedings in this case.

2. Reassign this case to a different judge as provided under the rules governing the Sixth Judicial Circuit in Florida.

VERIFICATION

I, Christopher Gleason, hereby verify that the facts stated in this motion are true and correct to the best of my knowledge and belief.

Respectfully submitted,

/s/ Christopher Gleason

Christopher Gleason

1628 Sand Key Estates Court

Clearwater, FL 33767

727-480-2059

gleasonforpinellas@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via email on this September 19, 2024 to: JARED N. KAHN, ESQ., Attorney for Defendant Julie Marcus, in her official capacity as Pinellas County Supervisor of Elections, at jkahn@pinellas.gov and eservice@pinellas.gov and to JEFFREY N. KLEIN, ESQ., Attorney for Defendant Pinellas County Canvassing Board, at jklein@pinellas.gov and eservice@pinellas.gov.

JARED D. KAHN

Florida Bar Number 105276

Senior Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, Sixth Floor

Clearwater, FL 33756

Primary e-mail address: jkahn@pinellas.gov

Secondary e-mail address: eservice@pinellas.gov

Attorney for Julie Marcus, in her official capacity as

Pinellas County Supervisor of Elections

JEFFREY N. KLEIN
Florida Bar Number 1025117
Assistant County Attorney
Pinellas County Attorney's Office
315 Court Street, 6th Floor.
Clearwater, FL 33756
Tel: 727-464-3354/Fax: 727-464-4147
Primary e-mail address: jklein@pinellas.gov
Secondary e-mail address: eservice@pinellas.gov
Attorney for Defendant, Attorney for the Pinellas
County Canvassing Board

/s/ Christopher Gleason

Dated: 09/19/2024

Filing # 221986820 E-Filed 04/29/2025 09:25:07 AM

IN THE SECOND DISTRICT COURT OF APPEAL
STATE OF FLORIDA

CHRISTOPHER GLEASON

Appellant/Petitioner,

vs.

JULIE MARCUS, et. al.,

Appellees/Respondents

Case No. 2D2024-2687; 2D2024-2688

L.T. Case No. 522024CA003717; 522024CA003995

AMENDED AND SUPPLEMENTED MOTION TO DISQUALIFY COUNTY ATTORNEYS AND BAR USE OF TAXPAYER FUNDS FOR DEFENSE

COMES NOW, Appellant Christopher Gleason, pro se, and respectfully moves this Honorable Court to disqualify Attorneys Kelly Vicari, Jared Kahn, Jeffrey Klein, and all other attorneys from the Pinellas County Attorney's Office from representing Appellees in this matter, and to prohibit the use of public funds for their defense. This motion is based on disqualifying conflicts of interest, ethical violations, unlawful public expenditures, and structural due process violations arising from an alleged vote-by-mail (VBM) fraud scheme. The motion is brought pursuant to Florida Rule of Appellate Procedure 9.300; Florida Statutes §§ 111.07, 104.0616, 104.13, 838.022, 97.0585, 119.07; 18 U.S.C. §§ 1341, 1343; 52 U.S.C. §

20511; Florida Rules of Professional Conduct 4-1.7, 4-3.7, 4-1.10, 4-3.4, 4-8.4; and controlling case law.

I. FACTUAL BASIS FOR DISQUALIFICATION AND RELIEF REQUESTED

1. On June 23, 2024, 219,673 VBM ballots were illegally requested in Pinellas County, followed by 196,055 on September 9, 2024, without the voter having provided the statutory required identification verification upon request, violating Fla. Stat. § 101.62(1)(b), as evidenced by Florida Division of Elections VBM reports (Exhibit B, EXHIBITS A_Q.pdf; Exhibit B, attached). This mass-scale fraud undermines the 'right to vote' and 'equal protection' in the 'manner of its exercise,' per *Bush v. Gore*, 531 U.S. 98, 104-05 (2000), and necessitates disqualification and transparency.

2. These mail ballot requests included ballots for one unprotected voter, Jeffrey Klein, whose record was misused as part of systemic Florida Voter Registration System (FVRS) manipulation, and two protected voters, County Attorney Jared Kahn and Branden M. Vicari, the husband of County Attorney Kelly Vicari, as shown in VBM reports (Exhibit B, attached). A marriage record confirms Vicari's spousal connection (Exhibit A). Due to their protected status under Fla. Stat. § 97.0585, Kahn and Vicari were procedurally unable

to request VBM ballots online, as confirmed by a screenshot of the protected voter lock on the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov, Exhibit C, Exhibit G) and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf).

3. The unauthorized VBM requests, flagged as "N/N" (no ID provided) includes a Sunday submission on June 23, 2024, when the Supervisor of Elections' office was closed (Exhibit C, EXHIBITS A_Q.pdf). This constitutes prima facie evidence of and internal control override of election system fraud protections, false entry into official election records, and VBM fraud, as detailed in Appellant's affidavit (Exhibit D, attached). The "N/N" status and Sunday submission refute claims of legitimate requests, as no authorized mechanism existed for these submissions.

4. Attorneys Kahn and Klein, who represent Appellees, are material witnesses to, victims of, participants in, and/or beneficiaries of the alleged election fraud, as their voter records were misused (Exhibit B), creating disqualifying conflicts under Rule 4-3.7 (lawyer as witness) and Rule 4-1.7 (personal interest), Florida Rules of Professional Conduct. Their roles as government attorneys at the

Pinellas County Attorney's Office are confirmed by Florida Bar profiles (Exhibit F).

5. Attorney Vicari, whose husband Branden M. Vicari was also affected (Exhibits A, B), is personally entangled in the misconduct, creating a direct and substantial conflict of interest due to her spousal relationship. See *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009).

6. The County Attorneys sought to seal all exhibits, including official election records, VBM reports (Exhibit B) and publicly available public records and material widely available on the internet, to conceal any evidence of fraud implicating defendants, themselves, Vicari's husband, and judicial officers (Exhibit O, EXHIBITS A_Q.pdf), as evidenced by Jared Kahn's email and draft sealing order (Exhibit E, Pages 21-22). The resulting court orders (Exhibit E, Pages 23-27), granted by Judge Patricia Muscarella, are overbroad, encompassing non-exempt records without specific exemptions, violating Fla. Stat. § 119.07. This demonstrates bad faith under Fla. Stat. § 111.07, as *Times Publishing Co. v. Burke*, 375 So. 2d 297, 300 (Fla. 2d DCA 1979), and *Wait v. Florida Power & Light Co.*, 372 So. 2d 420, 424 (Fla. 1979), mandate narrowly tailored restrictions.

7. The Supervisor of Elections' office obstructed lawful requests for forensic audit data, claiming production of the requested data would take 19,000 hours to complete (Exhibit N, EXHIBITS A_Q.pdf), displaying a pattern of concealment consistent with the sealing effort (Exhibit E), implicating internal use of override credentials to falsify records, and establishing willful and knowing prima facie evidence of Official Misconduct a violation of 838.022 F.S.

8. Multiple judicial officers, including trial judges and assistants, had their protected VBM statuses overridden (Exhibit O), as corroborated by the VBM reports and protected voter lock system in place (Exhibits B, C), indicating a systemic misconduct reaching the judiciary. The sealing orders by Judge Patricia Muscarella (Exhibit E, Pages 23-27), potentially influenced by conflicted attorneys (Exhibits B, F), further taint the tribunal. This entanglement violates the *'basic requirement of due process'* for a *'fair trial in a fair tribunal,'* as held in *In re Murchison*, 349 U.S. 133, 136 (1955), and *Berger v. United States*, 295 U.S. 78, 85 (1935), necessitating recusal to prevent *'even the probability of unfairness.'*

9. This widespread misconduct establishes a cascade conflict, a systemic failure and structural error where attorneys,

election officials, and judicial officers are entangled as victims of, witnesses to, and/or participants, and/or beneficiaries of the same fraud, rising to a structural due process violation that dwarfs the structural errors per *Rogers v. State*, 630 So. 2d 513 (Fla. 1993), and aligns with *Williams v. Pennsylvania*, 579 U.S. 1, 8-9 (2016), which held '*an unconstitutional potential for bias*' creates a structural defect, and (*Young v. United States*, 481 U.S. 787, 803-04 (1987)), requiring disqualification for conflicted counsel.

II. VIOLATIONS OF FLORIDA LAW, FEDERAL LAW, AND BAR RULES

10. Under F.S. § 111.07, public officials are not entitled to taxpayer-funded defense if they act in bad faith or outside their duties. The County Attorneys' sealing of public VBM reports (Exhibit E) and representation, despite personal entanglement (Exhibits A, B, F), demonstrate bad faith, disqualifying the use of public funding. See *Thornber v. City of Fort Walton Beach*, 568 So. 2d 914 (Fla. 1990) and *Lomax v. City of Miami*, 977 So. 2d 677, 679 (Fla. 3d DCA 2008), which held that Fla. Stat. § 111.07 does not authorize funding for bad-faith actions that '*do not serve a public purpose.*'

11. The unauthorized VBM requests for Kahn, Klein, and Vicari's husband (Exhibit B), which has been confirmed as an

impossibility for protected voters, as shown by the protected voter lock on the Supervisor of Elections' website (Exhibit C, Exhibit G), violate F.S. §§ 104.0616 (VBM fraud), 104.13 (false returns), and 838.022 (official misconduct), as well as 18 U.S.C. §§ 1341, 1343 (wire/mail fraud) and 52 U.S.C. § 20511 (federal election fraud).

12. The override of voters with protected status (Exhibits A, B, C, G), is in violation of Fla. Stat. § 97.0585, because confidential voter records were accessed without authorization, constituting:

(a) A civil claim under Fla. Stat. § 119.07 for record manipulation, exacerbated by sealing (Exhibit E);

(b) A criminal charge under Fla. Stat. § 104.13 for false returns;

(c) A violation of F.S. § 838.022 for official misconduct;

13. The sealing effort (Exhibit E, Pages 21-27) violates Fla. Stat. § 119.07 by obstructing access to non-exempt VBM reports (Exhibit B), ignoring redaction options under Fla. Stat. § 119.07(2)(b), and demonstrating an intent to conceal fraud, as evident in Jared Kahn's email (Exhibit E, Page 21) which sought to seal all exhibits despite discussing only Exhibit G. This disqualifies the use of public funding for attorneys under Fla. Stat. § 111.07, and violates Rule 4-

8.4 (misconduct). *Times Publishing Co. v. Burke*, 375 So. 2d 297, 300 (Fla. 2d DCA 1979), mandates that restrictions be '*narrowly tailored*,' and *Wait v. Florida Power & Light Co.*, 372 So. 2d 420, 424 (Fla. 1979), emphasizes the public's right to inspect records, rendering the sealing order impermissible.

14. Under the Florida Rules of Professional Conduct:

(a) Rule 4-1.7 bars representation when personal interests, such as those identified with Kahn, Klein, and Vicari's entanglement (Exhibits A, B, F), materially limit advocacy. Even if unaware, their witness status (Exhibit B) and sealing effort (Exhibit E) demonstrate a personal stake, as *Young v. United States*, 481 U.S. 787, 803-04 (1987), warned that '*counsel's personal interest in the outcome*' impairs fairness, requiring disqualification.

(b) Rule 4-3.7 prohibits Kahn and Klein from serving as advocates, as their VBM records make them material witnesses (Exhibit B). *Anderson v. State*, 420 So. 2d 574, 576 (Fla. 1982), mandates disqualification when an attorney's testimony compromises judicial integrity, a principle applicable to their dual roles.

(c) Rule 4-1.10 imputes conflicts with all County Attorneys, as the pervasive fraud (Exhibits B, O) and sealing effort (Exhibit E) preclude impartial representation in this small office (21-50 attorneys, Exhibit F). *State v. Michaels*, 454 So. 2d 560, 562 (Fla. 1984), held that conflicts in small firms are imputed due to the close professional relationships.

(d) Rule 4-3.4(a) was breached by obstructing evidence through the sealing of exhibits (Exhibit E).

(e) Rule 4-8.4, which involves dishonesty and prejudice to justice, was also violated due to the sealing of exhibits (Exhibit E).

13. In *Moakley v. Smallwood*, 826 So. 2d 221 (Fla. 2002), the Florida Supreme Court upheld sanctions for litigation conduct which undermined judicial integrity, a close parallel applicable to the sealing of exhibits in this case (Exhibit E).

14. *Caperton v. A.T. Massey Coal Co.*, 556 U.S. 868 (2009) holds that the probability of bias by attorneys who are entangled as witnesses (Exhibits A, B, F), is constitutionally intolerable.

15. *Tumey v. Ohio*, 273 U.S. 510 (1927) establishes that a personal interest, such as Vicari's spousal conflict (Exhibit A), violates the Fourteenth Amendment.

16. *Rogers v. State*, 630 So. 2d 513 (Fla. 1993) confirms that cumulative bias, as evidenced by the attorneys' conflicts and sealing actions (Exhibits A, B, C, E, F), constitutes structural error, not subject to harmless-error review.

III. SYSTEMIC CASCADE CONFLICT AND STRUCTURAL ERROR BREAKDOWN

17. This case presents a cascade conflict, a systemic failure where County Attorneys (Exhibits A, B, F), election officials (Exhibit N), and judicial officers (Exhibit O) are entangled as victims of, witnesses to, and/or participants in, and/or beneficiaries of the same VBM fraud, as confirmed by the protected voter lock (Exhibit C, Exhibit G) and sealing effort (Exhibit E). Table 1 summarizes this entanglement. As *Williams v. Pennsylvania*, 579 U.S. 1, 8-9 (2016), articulated, '*an unconstitutional potential for bias exists when the same person serves as both accuser and adjudicator*,' necessitating disqualification.

18. Table 1: Cascade Conflict Entanglement:

Party	Role	Conflict Evidence	Exhibit	Legal Basis
Kelly Vicari	County Attorney	Spousal conflict via husband's VBM misuse	A, B, F	Rule 4-1.7, Caperton
Jared Kahn	County Attorney	Witness/victim via VBM misuse, sealing proponent	B, E, F	Rule 4-3.7, Young
Jeffrey Klein	County Attorney	Witness/victim via VBM misuse	B, F	Rule 4-3.7, Young
County Attorney's Office	Counsel	Imputed conflict in small office	F, O	Rule 4-1.10, Michaels
Election Officials	Defendants	Audit obstruction, fraud facilitation	N	F.S. § 104.0616
Judicial Officers	Tribunal	VBM status overrides	O	In re Murchison, Berger

19. The sealing of public records (Exhibit E, Pages 21-27) obstructs the tribunal's ability to evaluate systemic fraud, undermining judicial neutrality and reflecting an institutional collapse of ethical safeguards. The overbroad court orders (Exhibit E, Pages 23-27), influenced by conflicted attorneys (Exhibits B, F), exacerbate this cascading conflict, necessitating

vacatur; see *Times Publishing Co. v. Burke*, 375 So. 2d 297, 300 (Fla. 2d DCA 1979).

20. This entanglement violates the constitutional guarantee of due process under the Florida Constitution (Article I, § 9) and U.S. Constitution (Fourteenth Amendment), threatening the impartiality of the tribunal itself. *In re Murchison*, 349 U.S. 133, 136 (1955), mandated an '*absence of actual bias*' and prevention of '*the probability of unfairness*,' and *Berger v. United States*, 295 U.S. 78, 85 (1935), requires avoiding any '*appearance of bias*' to maintain public confidence, thus necessitating the disqualification of conflicted attorneys, and recusal of affected judicial officers (Exhibit O).

21. Judicial recusal and attorney disqualification are constitutionally mandated to preserve the integrity of these proceedings, as held in *Caperton* and *Tumey*.

22. The cascade conflict, exacerbated by the sealing efforts (Exhibit E), undermines public confidence and violates Appellant's right to a neutral tribunal. By compromising electoral integrity, this misconduct threatens the '*equal protection*' of voting rights, as *Bush v. Gore*, 531 U.S. 98, 104-05 (2000), warned against '*arbitrary and*

disparate treatment' in vote processing, dwarfing the trial-specific bias in *Rogers*.

IV. PRAYER FOR RELIEF

WHEREFORE, Appellant respectfully requests this Court:

1. Disqualify Kelly Vicari, Jared Kahn, Jeffrey Klein, and all attorneys affiliated with the Pinellas County Attorney's Office, from representing Appellees, due to their conflicts of interest (Exhibits A, B, C, E, F).

2. Bar the use of taxpayer funds for Appellees' defense, as their ultra vires, criminal, and bad-faith misconduct (Exhibits B, E) violates Fla. Stat. § 111.07.

3. Refer these matters to the Florida Bar for investigation and discipline of violations to Rules 4-1.7, 4-3.7, 4-1.10, 4-3.4, 4-8.4 (Exhibits A, B, E, F).

4. Direct the immediate production of the VR Systems Voter Focus audit logs, voter override logs, forensic election data, and full 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports from the Florida Division of Elections (Exhibit B, Exhibit N), to confirm the protected voter manipulation which occurred, and the unauthorized VBM requests for Branden M. Vicari,

Jared Kahn, and Jeffrey Klein, because the Supervisor of Elections' obstruction (19,000-hour estimate, Exhibit N), prevents access to critical evidence.

5. Deny or vacate any orders sealing exhibits, as such actions obstruct public access to evidence of fraud (Exhibits B, E) and violate Fla. Stat. § 119.07.

6. Grant such other relief as this Court deems just and proper.

V. CERTIFICATE OF GOOD FAITH

I HEREBY CERTIFY that this motion is filed in good faith, based on newly discovered evidence (Exhibits A, B, C, E, F, G) and prior filings (Exhibits A-Q, EXHIBITS A_Q.pdf), and is not for purposes of delay.

VI. LIST OF EXHIBITS

1. **Exhibit A**: Marriage Record for Kelly Vicari: A copy of the marriage record from the Pinellas County Clerk of Court website, dated November 8, 2014 (I#: 2014315203, BK: 18589 PG: 976, recorded 11/13/2014), confirming that Kelly Vicari (formerly Kelly Lynn Lewis) is married to Branden M. Vicari. This record establishes Vicari's spousal connection to a protected voter whose unauthorized

VBM requests on June 23, 2024, and September 9, 2024, create a disqualifying conflict under Rule 4-1.7 and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), as detailed in ¶¶ 5, 9 of the motion.

2. **Exhibit B**: VBM Election Reports Naming Vicari's Husband, Kahn, and Klein: Excerpts from the 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports, obtained from the Florida Department of State, Division of Elections at

https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports, pursuant to Florida Rule 1S-2.043, Rule 1S-2.055, and Fla. Stat. § 101.62. The reports, partially included due to ongoing production delays by the Supervisor of Elections (Exhibit N), are intended to show the unauthorized VBM requests for Branden M. Vicari, Jared Kahn, and Jeffrey Klein, on June 23, 2024, and September 9, 2024, flagged as "N/N" (no identification provided), violating Fla. Stat. § 101.62(1)(b). These requests, part of the 219,673 and 196,055 illegal VBM ballot requests, confirm the attorneys' status as material witnesses and/or victims, necessitating their disqualification under Rule 4-3.7 and Rule 4-1.10, as alleged in ¶¶ 1-5, 9. Full reports are requested per ¶ D.

3. **Exhibit C:** Screenshot of the lock placed on Protected Voters on Pinellas County Supervisor of Elections Website: A screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov), captured on April 11, 2025, by John Siamas using Zight Screen Capture (Exhibit G), showing how a protected voter cannot request a VBM ballot online VBM requests for protected voters, as mandated by Fla. Stat. § 97.0585 and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf). The screenshot displays a "*Protected*" status or error message, confirming that requests for Branden M. Vicari and Jared Kahn were technically impossible without fraud or manual override, all which support the fraud allegations and attorneys' conflicts in ¶¶ 2-4, 9.

4. **Exhibit D:** Affidavit of Christopher Gleason: An affidavit by Appellant Christopher Gleason, dated April 28, 2025, attesting to the acquisition and authenticity of Exhibits A, B, C, E, F, G, and their relevance to the alleged VBM fraud involving voters whose information is protected, including Branden M. Vicari, Jared Kahn, and Jeffrey Klein. The affidavit confirms the marriage record's link to Vicari, the VBM reports' evidence of unauthorized requests, the screenshot's demonstration of the restriction placed on protected

voters, the sealing of exhibits/court records as attempted obstruction, and the attorneys' roles, all which support the motion's claims in ¶¶ 1-9.

5. **Exhibit E:** County Attorneys' Drafted Order and Court Orders to Seal Exhibits: A copy of the County Attorneys' draft sealing order, dated September 20, 2024, attached to Jared Kahn's email (Exhibit E, Pages 21-22), and court orders by Judge Patricia Muscarella (Exhibit E, Pages 23-27), requesting and granting the sealing of all exhibits in Case No. 522024CA003995XXCICI, including public election records (Exhibit B). These actions violate F.S. § 119.07 by obstructing access to non-exempt records and demonstrate bad faith under F.S. § 111.07, as alleged in ¶¶ 6, 9, reinforcing the need for disqualification and the prohibition of public funds for Defendant's legal fees.

6. **Exhibit F:** Florida Bar Member Profiles for Kelly Vicari, Jared Kahn, and Jeffrey Klein: Screenshots from the Florida Bar website (https://www.floridabar.org), captured April 24, 2025, confirming Kelly Vicari (Bar #88704), Jared Kahn (Bar #105276), and Jeffrey Klein (Bar #1025117) as government attorneys at the Pinellas County Attorney's Office (315 Court St, Clearwater, FL). These

profiles verify their roles, practice areas (City/County/Local Government Law), and office size (21-50 attorneys), supporting their disqualification under Rule 4-1.7, Rule 4-3.7, and imputed disqualification under Rule 4-1.10, as alleged in ¶¶ 4-5, 9, 14.a-c.

7. **Exhibit G:** Affidavit of John Siamas: Affidavit of John Siamas, dated April 28, 2025, attesting to the capture of a screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov) on April 11, 2025, using Zight Screen Capture. The affidavit confirms the screenshot's authenticity, showing a '*Protected*' status error message blocking online VBM requests for protected voters, as mandated by Fla. Stat. § 97.0585, supporting fraud allegations and attorney conflicts in ¶¶ 2-4, 9.

Dated: April 28, 2025

Respectfully submitted,

/s/ Christopher Gleason

Christopher Gleason, Pro Se
2098 Seminole Blvd #62122
Largo, FL 33778
Phone: 727-480-2059
Email: gleasonforpinellas@gmail.com

I HEREBY CERTIFY that a true and correct copy of the foregoing, along with Exhibits A, B, C, D, E, F, G, was furnished via email and the Florida Courts E-Filing Portal on April 24, 2025, to:

Clerk of the Second District Court of Appeal

Julie Marcus, Supervisor of Elections, Pinellas County

Dustin Chase, Deputy Supervisor of Elections

Matt Smith, General Counsel, Supervisor of Elections

Bruce Bartlett, Pinellas County State Attorney

Kelly L. Vicari, Esq., Jared Kahn, Esq., Jeffrey Klein, Esq., Attorneys for Appellees

/s/ Christopher Gleason

IV. NOTARY ACKNOWLEDGMENT

[AFFIANT SIGNATURE]

Sworn to and subscribed before me by means of ✓ physical presence or ____ online notarization, this 28th day of April 2025, by CHRISTOPHER GLEASON.

Notary Public – State of Florida

Scott Suprenant

[PRINT, TYPE, OR STAMP NAME OF NOTARY PUBLIC]

SCOTT SUPRENANT
Notary Public
State of Florida
Comm# HH506057
Expires 7/14/2028

Personally Known ____ OR Produced Identification ✓ [CHECK ONE]

Exhibit A

Marriage Record for Kelly Vicari

A copy of the marriage record obtained directly from the Pinellas County Clerk of Court website, dated November 8, 2014, confirming that Kelly Vicari is married to Branden M. Vicari. The record is authentic and unaltered and recorded as I#:2014315203 BK: 18589 PG:976, 11/13/2014 at 02:15 PM by KEN BURKE. This record establishes Vicari's spousal connection to a protected voter whose unauthorized VBM requests on June 23, 2024, and September 9, 2024, create a disqualifying conflict under Rule 4-1.7 and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), as detailed in ¶¶ 5, 8 of the motion.

I#: 2014315203 BK: 18589 PG: 976, 11/13/2014 at 02:15 PM, RECORDING 1 KEN BURKE, CLERK OF COURT AND COMPTROLLER PINELLAS COUNTY, FL BY DEPUTY CLERK: CLKPR03

Department of Health • Vital Statistics

STATE OF FLORIDA
MARRIAGE RECORD

TYPE IN UPPER CASE
USE BLACK INK

This license not valid unless seal of Clerk, Circuit or County Court, appears thereon.

(STATE FILE NUMBER)

2014 ML 2891182
(APPLICATION NUMBER)

APPLICATION TO MARRY

1. GROOM'S NAME (First, Middle, Last)			2. DATE OF BIRTH (Month, Day, Year)
BRANDEN MICHAEL VICARI			12/09/1984
3a. RESIDENCE - CITY, TOWN, OR LOCATION	3b. COUNTY	3c. STATE	4. BIRTHPLACE (State or Foreign Country)
PALM HARBOR	PINELLAS	FL	NY
5a. BRIDES NAME (First, Middle, Last)	5b. MAIDEN SURNAME (If different)		6. DATE OF BIRTH (Month, Day, Year)
KELLY LYNN LEWIS	LEWIS		08/23/1986
7a. RESIDENCE - CITY, TOWN, OR LOCATION	7b. COUNTY	7c. STATE	8. Birthplace (State or Foreign Country)
PALM HARBOR	PINELLAS	FL	MI

WE THE APPLICANTS NAMED IN THIS CERTIFICATE, EACH FOR HIMSELF OR HERSELF, STATE THAT THE INFORMATION PROVIDED ON THIS RECORD IS CORRECT TO THE BEST OF OUR KNOWLEDGE AND BELIEF, THAT NO LEGAL OBJECTION TO THE MARRIAGE NOR THE ISSUANCE OF A LICENSE TO AUTHORIZE THE SAME IS KNOWN TO US AND HEREBY APPLY FOR LICENSE TO MARRY.

9. SIGNATURE OF GROOM (Sign full name using black ink)	10. SUBSCRIBED AND SWORN TO BEFORE ME ON (DATE)
> [signature]	10/13/2014
11. TITLE OF OFFICIAL	12. SIGNATURE OF OFFICIAL (Use black ink)
DEPUTY CLERK	> [signature]
13. SIGNATURE OF BRIDE (Sign full name using black ink)	14. SUBSCRIBED AND SWORN TO BEFORE ME ON (DATE)
> [signature]	10/13/2014
15. TITLE OF OFFICIAL	16. SIGNATURE OF OFFICIAL (Use black ink)
DEPUTY CLERK	> [signature]

LICENSE TO MARRY

AUTHORIZATION AND LICENSE IS HEREBY GIVEN TO ANY PERSON DULY AUTHORIZED BY THE LAWS OF THE STATE OF FLORIDA TO PERFORM A MARRIAGE CEREMONY WITHIN THE STATE OF FLORIDA AND TO SOLEMNIZE THE MARRIAGE OF THE ABOVE NAMED PERSONS. THIS LICENSE MUST BE USED ON OR AFTER THE EFFECTIVE DATE AND ON OR BEFORE THE EXPIRATION DATE IN THE STATE OF FLORIDA IN ORDER TO BE RECORDED AND VALID.

17. COUNTY ISSUING LICENSE	18. DATE LICENSE ISSUED	18a. DATE LICENSE EFFECTIVE	19. EXPIRATION DATE
PINELLAS	10/13/2014	10/16/2014	12/15/2014

20a. SIGNATURE OF COURT CLERK OR JUDGE	20b. TITLE	20c. BY D.C.
> [signature]	CLERK OF THE CIRCUIT COURT AND COMPTROLLER	DLF

CERTIFICATE OF MARRIAGE

I HEREBY CERTIFY THAT THE ABOVE NAMED GROOM AND BRIDE WERE JOINED BY ME IN MARRIAGE IN ACCORDANCE WITH THE LAWS OF THE STATE OF FLORIDA.

21. DATE OF MARRIAGE (Month, Day, Year)	22. CITY, TOWN, OR LOCATION OF MARRIAGE
Nov. 8, 2014	TAMPA, FLORIDA
23a. SIGNATURE OF PERSON PERFORMING CEREMONY (Use black ink)	23c. ADDRESS (Of person performing ceremony)
> [signature]	2686 BAYSHORE BLVD. DUNEDIN, FL
23b. NAME AND TITLE OF PERSON PERFORMING CEREMONY (Or notary stamp)	24. SIGNATURE OF WITNESS TO CEREMONY (Use black ink)
REV. FR. JERRY J. RITTENHOUSE	> [signature]
	25. SIGNATURE OF WITNESS TO CEREMONY (Use black ink)
	> [signature]

Exhibit B:

VBM Election Reports Naming Vicari's Husband, Kahn, and Klein
Excerpts from the 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports, obtained from the Florida Department of State, Division of Elections at https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports, pursuant to Florida Rule 1S-2.043, Rule 1S-2.055, and F.S. § 101.62. The reports show unauthorized VBM requests for Branden M. Vicari, Jared Kahn, and Jeffrey Klein on June 23, 2024, and September 9, 2024, flagged as "N/N" (no identification verification), violating F.S. § 101.62(1)(b). These requests, part of 219,673 and 196,055 illegal requests, confirm the attorneys' status as material witnesses or victims, necessitating disqualification under Rule 4-3.7 and Rule 4-1.10, as alleged in ¶¶ 1-5, 8.

AUGUST 20, 2024 PRIMARY ELECTION

VOTE BY MAIL EARLY VOTING REPORT EXTRACT

NOVEMBER 2024 GENERAL ELECTION

VOTE BY MAIL EARLY VOTING REPORT EXTRACT

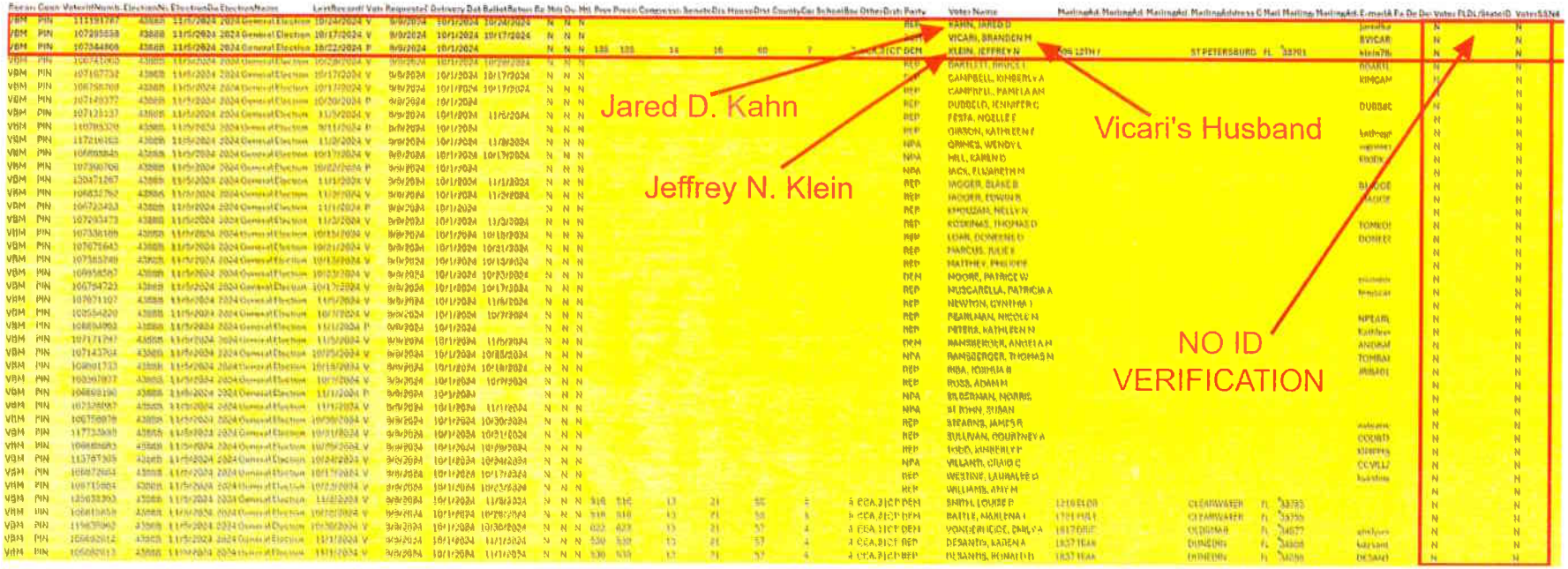


Exhibit C:

Screenshot of Protected Voter Lock on Pinellas County Supervisor of Elections Website
A screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov), captured on April 10, 2025, showing the protected voter lock mechanism that blocks online VBM requests for protected voters, as mandated by F.S. § 97.0585 and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf). The screenshot displays a "Protected" status or error message, confirming that requests for Branden M. Vicari, Kahn, and Klein were technically impossible without fraud or manual override, supporting the fraud allegations and attorneys' conflicts in ¶¶ 2-4, 8.

Julie Marcus
PINELLAS COUNTY
SUPERVISOR OF ELECTIONS

(/home)

Select Language

Powered by Translate (https://translate.google.com)

Search

ALL Mail Ballot Requests Expired! (/VoteByMail)

Public Notices (/Links/Public-Notices)

Important ADA Information (/adainformation)

REQUEST A MAIL BALLOT

Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.

Protected Voter Message

Select Language

Powered by Translate (https://translate.google.com)

Search for Voter Record

Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.

The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

First Name:

John

Exhibit D:

Affidavit of Christopher Gleason
An affidavit by Appellant Christopher Gleason, dated April 24, 2025, attesting to the acquisition and authenticity of Exhibits A, B, C, and E, and their relevance to the alleged VBM fraud involving protected voters Branden M. Vicari, Jared Kahn, and Jeffrey Klein. The affidavit confirms the marriage record's link to Vicari, the VBM reports' evidence of unauthorized requests, the screenshot's demonstration of protected voter restrictions, and the sealing attempt's obstruction, supporting the motion's claims in ¶¶ 1-8.

STATE OF FLORIDA
COUNTY OF PINELLAS

AFFIDAVIT OF CHRISTOPHER GLEASON REGARDING AMENDED AND SUPPLEMENTED MOTION TO DISQUALIFY COUNTY ATTORNEYS AND BAR USE OF TAXPAYER FUNDS FOR DEFENSE

BEFORE ME, the undersigned authority, personally appeared Christopher Gleason, who, being duly sworn, deposes and says:

1. I am the Appellant/Petitioner in Case Nos. 2D2024-2687 and 2D2024-2688, pending in the Second District Court of Appeal of Florida, and the Plaintiff in the lower court proceedings, Case Nos. 522024CA003717XXCICI and 522024CA003995XXCICI, in the Circuit Court of the Sixth Judicial Circuit, Pinellas County, Florida. I am over 18 years of age, competent to testify, and have personal knowledge of the facts stated herein.

2. I submit this affidavit in support of my Amended and Supplemented Motion to Disqualify County Attorneys and Bar Use of Taxpayer Funds for Defense, filed in the above-captioned cases, to attest to the acquisition, authenticity, and

relevance of Exhibits A, B, C, and E, which demonstrate conflicts of interest, ethical violations, and systemic vote-by-mail (VBM) fraud involving protected voters Branden M. Vicari, Jared Kahn, and Jeffrey Klein, as alleged in paragraphs 1-8 of the motion.

3. **Exhibit A: Marriage Record for Kelly Vicari**

On 04/24/2025, I obtained a copy of the marriage record for Kelly Vicari formerly Kelly Lynn Lewis, from the Pinellas County Clerk of Court website, confirming that she is married to Branden Michael Vicari. The record is authentic and unaltered and recorded as I#:2014315203 BK: 18589 PG:976, 11/13/2014 at 02:15 PM by KEN BURKE. This exhibit establishes Vicari's spousal connection to a protected voter whose unauthorized VBM requests on June 23, 2024, and September 9, 2024, create a disqualifying conflict of interest under Rule 4-1.7, Florida Rules of Professional Conduct, and Caperton v. A.T. Massey Coal Co., 556 U.S. 868 (2009), as detailed in paragraphs 5 and 8 of the motion.

4. **Exhibit B: VBM Election Reports Naming Vicari's Husband, Branden M. Vicari, Kahn, and Klein**

I personally accessed and downloaded excerpts from the 2024 Primary and General Election Pinellas County Vote-by-Mail Early Voting Reports from the Florida Department of State, Division of Elections, at https://countyballotfiles.floridados.gov/VoteByMailEarlyVotingReports/Reports, pursuant to Florida Rule 1S-2.043, Rule 1S-2.055, and F.S. § 101.62. These reports are authentic official election records and public records showing unauthorized VBM requests for Branden M. Vicari, Jared Kahn, and Jeffrey Klein on June 23, 2024, and September 9, 2024, flagged as "N/N" (no identification verification), in violation of F.S. § 101.62(1)(b). The requests, part of 219,673 and 196,055 illegal requests, confirm the attorneys' status as material witnesses or victims, necessitating disqualification under Rule 4-3.7 and Rule 4-1.10, as alleged in paragraphs 1-5 and 8 of the motion.

5. **Exhibit C: Screenshot of Protected Voter Lock on Pinellas County Supervisor of Elections Website**

On or about April 10, 2025 I was with John Siamus who captured a screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov) using Zight Screen Capture. The screenshot is authentic, unaltered. It displays the protected voter lock mechanism, showing a "Protected" status or error message that blocks online VBM requests for protected voters, as mandated by F.S. § 97.0585 and VR Systems protocols (Exhibits D, I, EXHIBITS A_Q.pdf). This exhibit confirms that VBM requests for Branden M. Vicari, and Jared D. Kahn, and Klein were technically impossible without fraud or manual override, supporting the fraud allegations and attorneys' conflicts in paragraphs 2-4 and 8 of the motion.

6. **Exhibit E: County Attorneys' Motion to Seal Exhibits**

On 04/24/2025, I obtained a copy of the court order drafted by County Attorneys, dated [Insert Date of Motion], requesting to seal all exhibits in Case Nos. 522024CA003995XXCICI,

including public VBM reports (Exhibit B). The document is authentic, as obtained from [Specify Source, e.g., court docket, opposing counsel]. The sealing attempt violates F.S. § 119.07 by obstructing access to non-exempt records and demonstrates bad faith under F.S. § 111.07, as it seeks to conceal evidence of fraud implicating the attorneys, Branden M. Vicari, and judicial officers (Exhibit O, EXHIBITS A_Q.pdf), as alleged in paragraphs 6 and 8 of the motion.

7. The above exhibits are directly relevant to the motion's claims:

   a. Exhibit A confirms Vicari's personal conflict via her husband's involvement, supporting disqualification (¶ 5).

   b. Exhibit B establishes Jared D. Kahn, Jeffrey N. Klein, and Branden M. Vicari as witnesses or victims of VBM fraud, triggering Rule 4-3.7 and Rule 4-1.10 (¶¶ 1-5).

   c. Exhibit C proves the technical impossibility of the VBM requests, evidencing fraud and systemic misconduct (¶¶ 2-4, 8).

d. Exhibit E demonstrates the County Attorneys' bad faith and obstruction, justifying the bar on public funding and referral to the Florida Bar (¶¶ 6, 8).

8. The facts stated herein are true to the best of my knowledge and belief. I have not altered or misrepresented any exhibit, and I obtained them through lawful means as described. The exhibits support the motion's allegations of conflicts of interest, ethical violations, unlawful public expenditures, and a systemic cascade conflict violating due process, as detailed in paragraphs 1-8.

FURTHER AFFIANT SAYETH NAUGHT.

Dated: April 28, 2025

/s/ Christopher Gleason

Christopher Gleason
2098 Seminole Blvd #6212
Largo, FL 33778
Phone: 727-480-2059
Email: cpgleason72@gmail.com, gleasonforpinellas@gmail.com

STATE OF FLORIDA
COUNTY OF PINELLAS

Sworn to and subscribed before me this 28th day of April, 2025, by Christopher Gleason, who is personally known to me (or who produced identification:

Notary Public, State of Florida
Name: Scott Suprenant
Commission No.: HH506057
My Commission Expires: July 14, 2028
[Notary Seal]

SCOTT SUPRENANT
Notary Public
State of Florida
Comm# HH506057
Expires 7/14/2028

Exhibit E:

County Attorneys' Drafted Order to Seal Exhibits

A copy of the County Attorneys' draft of the sealing order, dated September 20, 2024, requesting to seal all exhibits in Case Nos. 522024CA003995XXCICI, including public election records (Exhibit B). This action violates F.S. § 119.07 by obstructing access to non-exempt records and demonstrates bad faith under F.S. § 111.07, as alleged in ¶¶ 6, 8, reinforcing the need for disqualification and barring public funding.

Gmail Christopher Gleason <gleasonforpinellas@gmail.com>

Proposed Order - Christopher Gleason v. Julie Marcus, et al. 24-003995-C

Kahn, Jared D <jkahn@pinellas.gov> Fri, Sep 20, 2024 at 8:28 AM
To: Christopher Gleason <gleasonforpinellas@gmail.com>
Cc: "immutabletruth@protonmail.com" <immutabletruth@protonmail.com>, Christopher Gleason <cpgleason72@gmail.com>, "Klein, Jeffrey" <jklein@pinellas.gov>, "Vicari, Kelly L" <kvicari@pinellas.gov>, "Curtis, Michelle M" <mmcurtis@pinellas.gov>, "Noe, Barbara" <banoe@pinellas.gov>

Mr Gleason,

I will submit the proposed order this morning noting your objection.

Have a blessed day,

Jared Kahn

On Sep 20, 2024, at 7:58 AM, Christopher Gleason <gleasonforpinellas@gmail.com> wrote:

I definitely object, you are asking to seal all exhibits. That was not even discussed or brought before the court. Your motion was to seal Exhibit G.

On Thu, Sep 19, 2024 at 5:19 PM Kahn, Jared D <jkahn@pinellas.gov> wrote:

Mr. Gleason,

Please see proposed order in Christopher Gleason v. Julie Marcus, et al. 24-003995-CI; GRANTING without prejudice DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS and GRANTING without prejudice DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION.

Please let me know if you have any objections or suggested edits. I will plan to upload this order tomorrow 9/20/24 morning around 11AM if I do not hear from you first.

Have a nice evening,

Jared D. Kahn

Senior Assistant County Attorney

Pinellas County Attorney's Office

315 Court Street, 6th Floor

Clearwater, FL 33756

Phone: (727) 464-3354

Fax: (727) 464-4147

jkahn@pinellas.gov

All government correspondence is subject to the public records law.

image001.png
35K

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON, Candidate for Supervisor of Elections, Pinellas County, Elector, Citizen, and Taxpayer,

Plaintiff,

v.

Case No.: 24-003995-CI
UCN: 522024CA003995XXCICI

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et al.,

Defendants.

_____/

ORDER GRANTING DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND GRANTING DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION

THIS MATTER came before this Court on September 19, 2024, on DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION, having considered the Motions, the case file, the applicable law, and otherwise fully advised in the premises, the Court hereby **ORDERS and ADJUDGES** that DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS is hereby **GRANTED without prejudice** and DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF

RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION is hereby **GRANTED without prejudice.**

The Pinellas County Clerk of the Circuit Court is directed to maintain all exhibits filed by Plaintiff as Protected/Confidential/Sensitive until further order of the court.

Plaintiff has until **September 19th, 2024,** to respond to DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS.

Plaintiff has until **September 23rd, 2024,** to re-file exhibits with Protected/Confidential/Sensitive data redacted or, in the alternative, file a response in opposition to DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTIVE AND JUDICIAL ADMINISTRATION stating the reason Protected/Confidential/Sensitive should not be protected.

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida this ____ day of September 2024. A true and correct copy of the forgoing has been furnished to all parties listed below.

Judge Patricia Muscarella

cc: all parties

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON, Candidate for Supervisor of Elections, Pinellas County, Elector, Citizen, and Taxpayer,

Plaintiff,

v.

Case No.: 24-003995-CI
UCN: 522024CA003995XXCICI

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et al.,

Defendants.

_____/

ORDER GRANTING DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND GRANTING DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION

THIS MATTER came before this Court on September 19, 2024, on DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS AND DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION, having considered the Motions, the case file, the applicable law, and otherwise fully advised in the premises, the Court hereby **ORDERS and ADJUDGES** that DEFENDANT JULIE MARCUS' MOTION TO DETERMINE THE CONFIDENTIALITY OF TRIAL COURT RECORDS is hereby **GRANTED without prejudice** and DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425,

FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION is hereby **GRANTED without prejudice.**

The Pinellas County Clerk of the Circuit Court is directed to maintain all exhibits filed by Plaintiff as Protected/Confidential/Sensitive until further order of the court.

Plaintiff represented to the Court that he would respond in writing with his opposition to Defendant's motions as to Exhibit G by close of business on September 19th, 2024. Although not received until the morning of September 20th, 2024, the Court nonetheless deems Plaintiff's opposition timely. Defendant shall have until **September 27th, 2024** to serve a reply, if any, to Plaintiff's opposition.

Plaintiff has until **September 23rd, 2024,** to re-file the additional exhibits with Protected/Confidential/Sensitive data redacted or, in the alternative, file a response in opposition to DEFENDANT'S MOTION FOR ORDER RELATED TO PLAINTIFF'S FILING OF SENSITIVE INFORMATION IN VIOLATION OF RULE 2.425, FLORIDA RULES OF GENERAL PRACTICE AND JUDICIAL ADMINISTRATION stating his basis or claim of exemption for the inapplicability of Protected/Confidential/Sensitive status as to the exhibits in question.

The parties may renew argument on Defendant's Motions and any related filings at the Case Management Conference scheduled in this matter on **October 1, 2024 at 12:00 P.M.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida this ____ day of September 2024. A true and correct copy of the forgoing has been furnished to all parties listed below.

Circuit Judge Patricia A. Muscarella
24-003995-CI 9/20/2024 3:52:08 PM

Judge Patricia Muscarella

Exhibit F:

Florida Bar Member Profiles for Kelly Vicari, Jared Kahn, and Jeffrey Klein

Screenshots from the Florida Bar website (https://www.floridabar.org), captured April 24, 2025, confirming Kelly Vicari (Bar #88704), Jared Kahn (Bar #105276), and Jeffrey Klein (Bar #1025117) as government attorneys at the Pinellas County Attorney's Office (315 Court St, Clearwater, FL). These profiles verify their roles, practice areas (City/County/Local Government Law), and office size (21-50 attorneys), supporting disqualification under Rule 4-1.7, Rule 4-3.7, and imputed disqualification under Rule 4-1.10, as alleged in ¶¶ 4-5, 9, 14.a-c.

MEMBER PROFILE

Kelly Lynn Vicari

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:

88704

Mail Address:

Pinellas County Attorney's Office
315 Court St
Clearwater, FL 33756-5165

Office: **727-464-3354**

Cell: **727-464-3354** - No Text Messages

Email:

kvicari@pinellascounty.org

Personal Bar URL:

https://www.floridabar.org/mybarprofile/88704

vCard:

County:

Pinellas

Circuit:

06

Admitted:

04/14/2011

10-Year Discipline History:

None

Law School:

Florida Coastal School of Law, 2010

Board Certifications:

Area	Year
City, County and Local Government Law	2019

Sections:

City, County & Local Govt Law

Practice Areas:

City/County/Local Government

Civil Litigation

Workers' Compensation/Defense

Federal Courts:

Florida Middle District Bankruptcy Court

U.S. District Court, Middle District of Florida

U.S. District Court, Northern District of Florida

Firm Position:

Government attorney

The Find a Lawyer directory is provided as a public service. The Florida Bar maintains limited basic information about lawyers licensed to practice in the state (e.g., name, address, year of birth, gender, law schools attended, admission year). However, The Florida Bar allows individual attorneys the opportunity to add personal and professional information to the directory. The lawyer is solely responsible for reviewing and updating any additional information in the directory. The lawyer's added information is not reviewed by The Bar for accuracy and The Bar makes no warranty of any kind, express or implied. The Florida Bar, its Board of Governors, employees, and agents are not responsible for the accuracy of that additional information. Publication of lawyers' contact information in this listing does not mean the lawyers have agreed to receive unsolicited communications in any form. Unauthorized use of this data may result in civil or criminal penalties. The Find a Lawyer directory is not a lawyer referral service.

MEMBER PROFILE

Jared Douglas Kahn

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:

105276

Mail Address:

Pinellas County Attorney's Office
315 Court St
Clearwater, FL 33756-5165

Office: **727-464-3354**

Email:

jkahn@pinellas.gov

Personal Bar URL:

https://www.floridabar.org/mybarprofile/105276

vCard:

County:

Pinellas

Circuit:

06

Admitted:

09/27/2013

10-Year Discipline History:

None

Law School:

John Marshall Law School

Sections:

City, County & Local Govt Law

Trial Lawyers

Practice Areas:

City/County/Local Government

Civil Trial

Criminal

Trial

Federal Courts:

U.S. Court of Appeals for the Eleventh Circuit

U.S. District Court, Middle District of Florida

U.S. District Court, Northern District of Florida

U.S. District Court, Southern District of Florida

State Courts:

District Of Columbia

Firm:

Pinellas County Attorney's Office

Firm Size:

21-50

Firm Position:

Government attorney

The Find a Lawyer directory is provided as a public service. The Florida Bar maintains limited basic information about lawyers licensed to practice in the state (e.g., name, address, year of birth, gender, law schools attended, admission year). However, The Florida Bar allows individual attorneys the opportunity to add personal and professional information to the directory. The lawyer is solely responsible for reviewing and updating any additional information in the directory. The lawyer's added information is not reviewed by The Bar for accuracy and The Bar makes no warranty of any kind, express or implied. The Florida Bar, its Board of Governors, employees, and agents are not responsible for the accuracy of that additional information. Publication of lawyers' contact information in this listing does not mean the lawyers have agreed to receive unsolicited communications in any form. Unauthorized use of this data may result in civil or criminal penalties. The Find a Lawyer directory is not a lawyer referral service.

MEMBER PROFILE

Jeffrey Nathaniel Klein

Member in Good Standing

Eligible to Practice Law in Florida

Bar Number:

1025117

Mail Address:

Pinellas County Attorney's Office
315 Court St Fl 6
Clearwater, FL 33756-5165

Office: **727-464-3354**

Email:

jklein@pinellascounty.org

Personal Bar URL:

https://www.floridabar.org/mybarprofile/1025117

vCard:

County:

Pinellas

Circuit:

06

Admitted:

11/23/2020

10-Year Discipline History:

None

Sections:

City, County & Local Govt Law

Young Lawyers

Firm:

Pinellas County Attorney's Office

Firm Position:

Government attorney

The Find a Lawyer directory is provided as a public service. The Florida Bar maintains limited basic information about lawyers licensed to practice in the state (e.g., name, address, year of birth, gender, law schools attended, admission year). However, The Florida Bar allows individual attorneys the opportunity to add personal and professional information to the directory. The lawyer is solely responsible for reviewing and updating any additional information in the directory. The lawyer's added information is not reviewed by The Bar for accuracy and The Bar makes no warranty

Exhibit G:

Affidavit of John Siamus

Affidavit of John Siamus, dated April 24, 2025, attesting to the capture of a screenshot from the Pinellas County Supervisor of Elections website (https://www.votepinellas.gov) on April 10, 2025, using Zight Screen Capture. The affidavit confirms the screenshot's authenticity, showing a 'Protected' status or error message blocking online VBM requests for protected voters, as mandated by F.S. § 97.0585, supporting fraud allegations and attorney conflicts in ¶¶ 2-4, 9.

AFFIDAVIT OF JOHN SIAMASDETAILING THE EVENTS OF REQUESTING A VOTE-BY-MAIL-BALLOT AS A PROTECTED VOTER

STATE OF FLORIDA)

) ss:

COUNTY OF PINELLAS)

Before me, the undersigned authority, personally appeared JOHN SIAMAS, who, being duly sworn, states as follows:

AFFIANT IDENTITY

1. I, John Siamas, was a Republican candidate for the Florida State Sente District 21 Primary Election held on August 20th, 2024. I am over 18 and competent to make this affidavit and have personal knowledge of the facts stated herein.

PURPOSE OF AFFIDAVIT

2. This affidavit is made to establish the process I underwent requesting a Mail Ballot from the Pinellas County Supervisor of Elections as a "Protected Voter" on April 11, 2025 at 12:17 p.m.

MAIL BALLOT REQUEST FROM THE PINELLAS COUNTY SUPERVISOR OF ELECTIONS OFFICE

3. On April 11, 2025, at 12:17 p.m., I accessed the Pinellas County Supervisor of Elections website (*votepinellas.gov*) to request a mail ballot. I took screenshots of the entire process and have included them as **Exhibit 1**.

4. After entering all the requested information, I received a message which stated "The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.

5. I then proceeded to call the Supervisor of Elections in Pinellas County as instructed in the message I received, at 12:20 p.m.

6. I spoke with a Supervisor of Elections Representative who stated that protected voters cannot request their Mail Ballot online. He then stated he could process my Mail Ballor request over the phone and proceeded to request some information in order to process the Mail Ballot request.

7. The information requested included my name, address, date of birth, and the last 4 of my SSN. I was not instructed to fill out any forms or provide any additional details to process the Mail Ballot request. I transcribed the full conversation with the Supervisor of Election Representative I had on April 11, 2025 (see **Exhibit 2**).

4. All of the records attached to this affidavit are true and correct copies of documents created at or near the time of the described events.

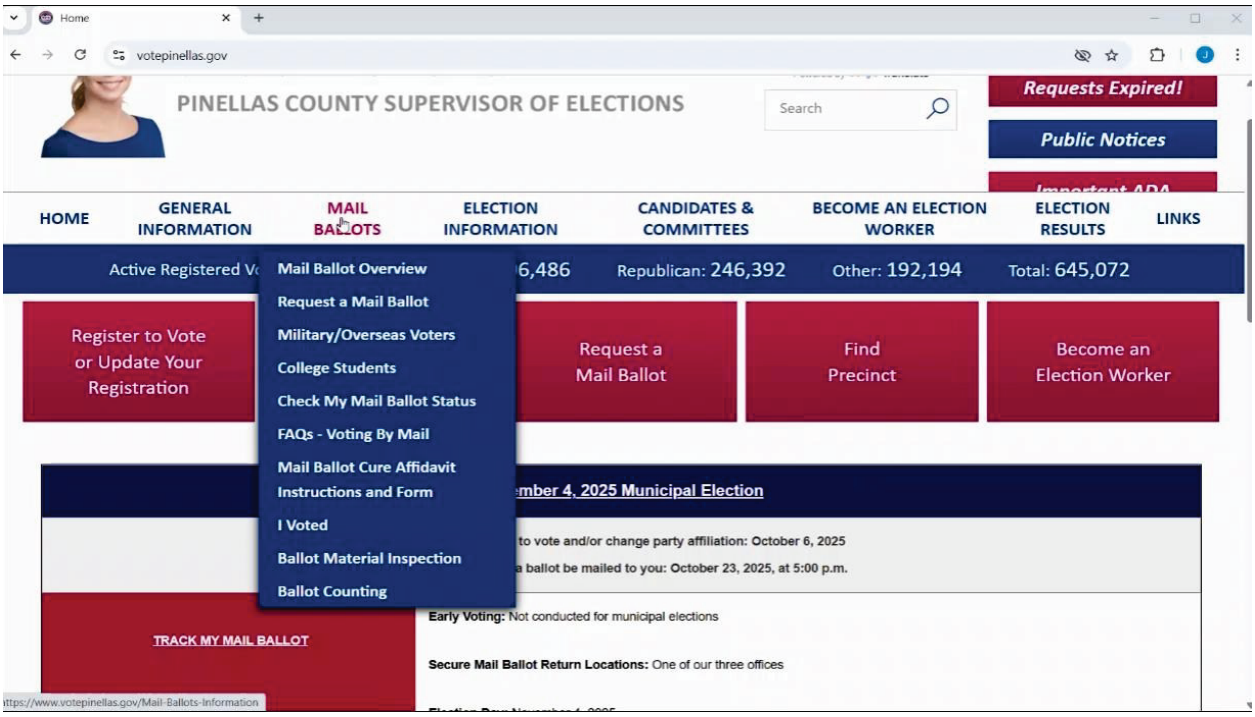
LIST OF EXHIBITS

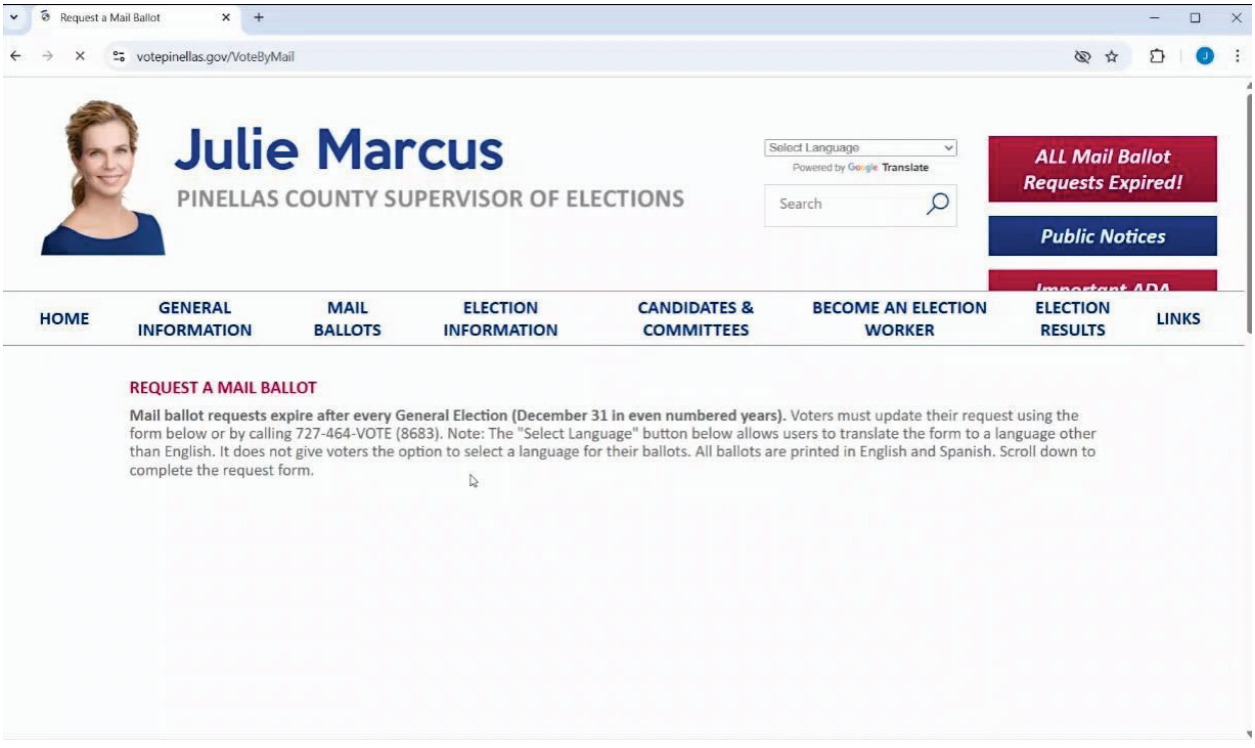
1. **Exhibit 1**: Screenshots of online Mail Ballot Request from the website of the Pinellas County Supervisor of Election website, *votepinellas.gov.*

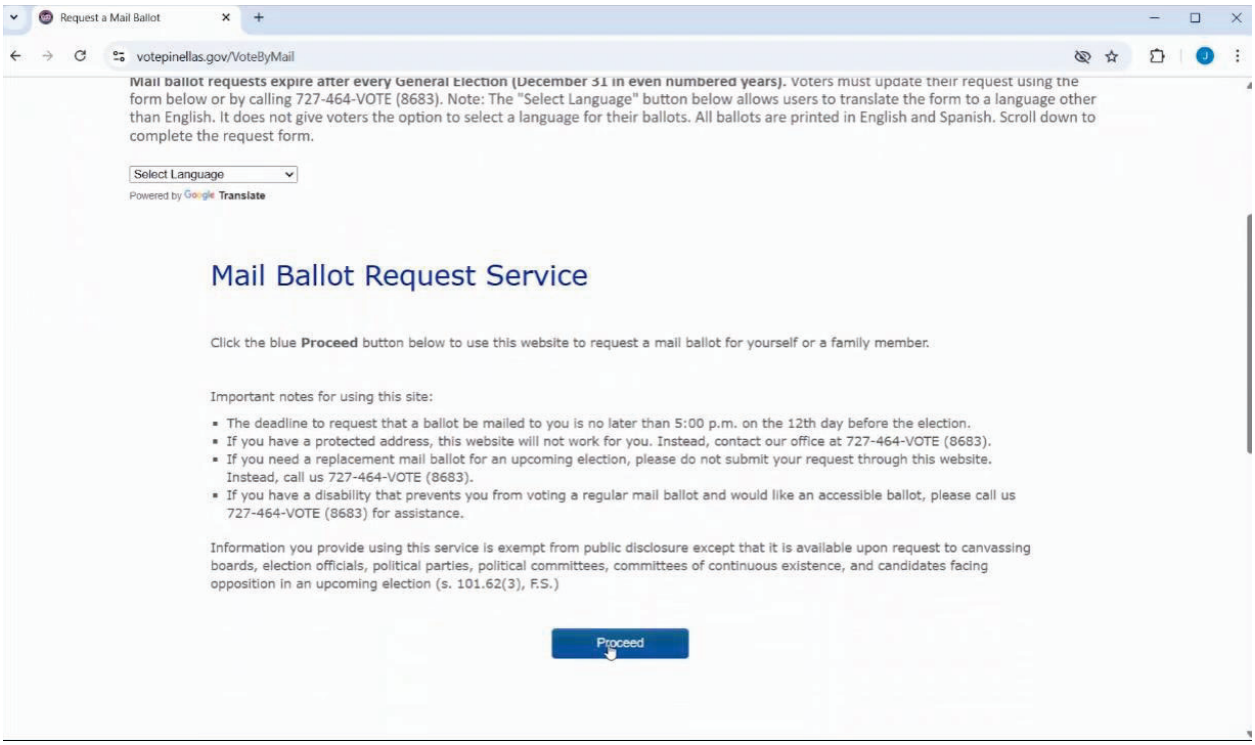
2. **Exhibit 2**: Transcription of Conversation with the Pinellas County Supervisor of Election Representative requesting a Mail Ballot on April 11, 2025, 12:20 p.m.

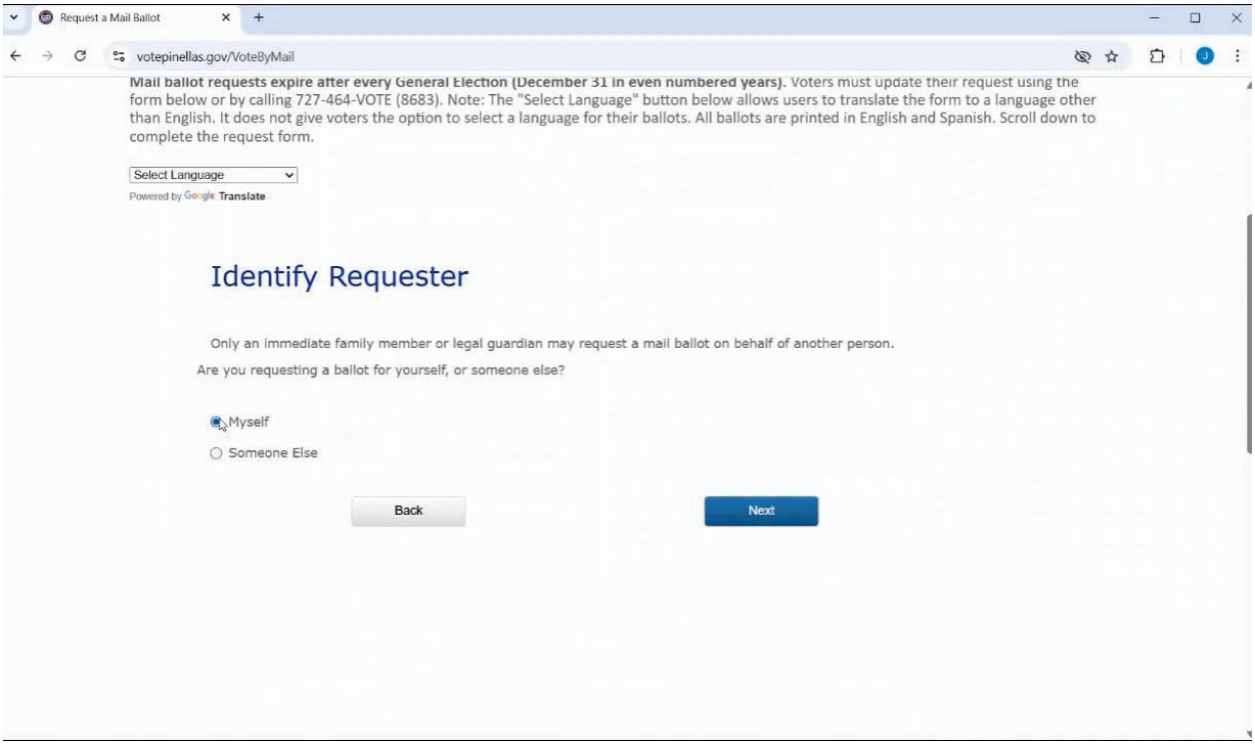
Exhibit 1

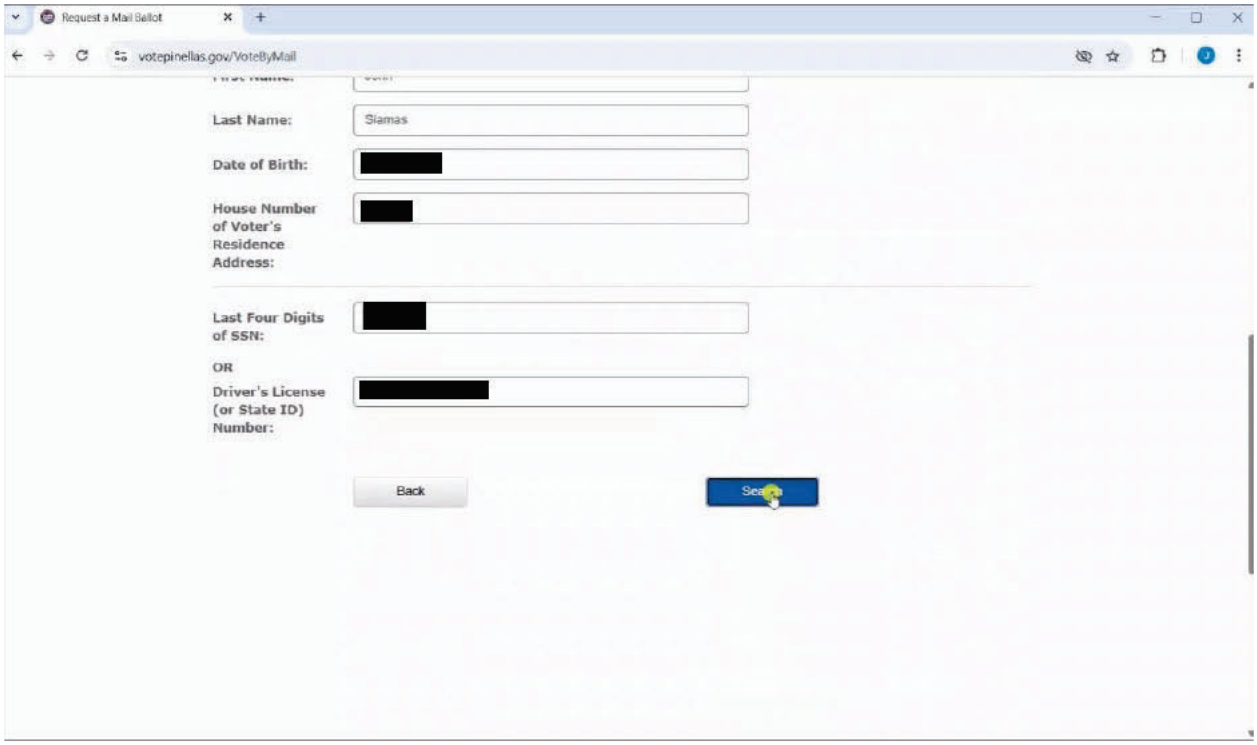
Screenshots of online Mail Ballot Request from the website of the Pinellas County Supervisor of Election website, *votepinellas.gov.*




votepinellas.gov/VoteByMail
Julie Marcus
PINELLAS COUNTY SUPERVISOR OF ELECTIONS
Select Language
Powered by Google Translate
Search
ALL Mail Ballot Requests Expired!
Public Notices
HOME
GENERAL INFORMATION
MAIL BALLOTS
ELECTION INFORMATION
CANDIDATES & COMMITTEES
BECOME AN ELECTION WORKER
ELECTION RESULTS
LINKS
REQUEST A MAIL BALLOT
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.


Request a Mail Ballot
votepinellas.gov/VoteByMail
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Mail Ballot Request Service
Click the blue Proceed button below to use this website to request a mail ballot for yourself or a family member.
Important notes for using this site:
The deadline to request that a ballot be mailed to you is no later than 5:00 p.m. on the 12th day before the election.
If you have a protected address, this website will not work for you. Instead, contact our office at 727-464-VOTE (8683).
If you need a replacement mail ballot for an upcoming election, please do not submit your request through this website. Instead, call us 727-464-VOTE (8683).
If you have a disability that prevents you from voting a regular mail ballot and would like an accessible ballot, please call us 727-464-VOTE (8683) for assistance.
Information you provide using this service is exempt from public disclosure except that it is available upon request to canvassing boards, election officials, political parties, political committees, committees of continuous existence, and candidates facing opposition in an upcoming election (s. 101.62(3), F.S.)
Proceed


Request a Mail Ballot
votepinellas.gov/VoteByMail
Mail ballot requests expire after every General Election (December 31 in even numbered years). Voters must update their request using the form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Identify Requester
Only an immediate family member or legal guardian may request a mail ballot on behalf of another person.
Are you requesting a ballot for yourself, or someone else?
Myself
Someone Else
Back
Next


Request a Mail Ballot
votepinellas.gov/VoteByMail
Last Name:
Siamas
Date of Birth:
House Number of Voter's Residence Address:
Last Four Digits of SSN:
OR
Driver's License (or State ID) Number:
Back

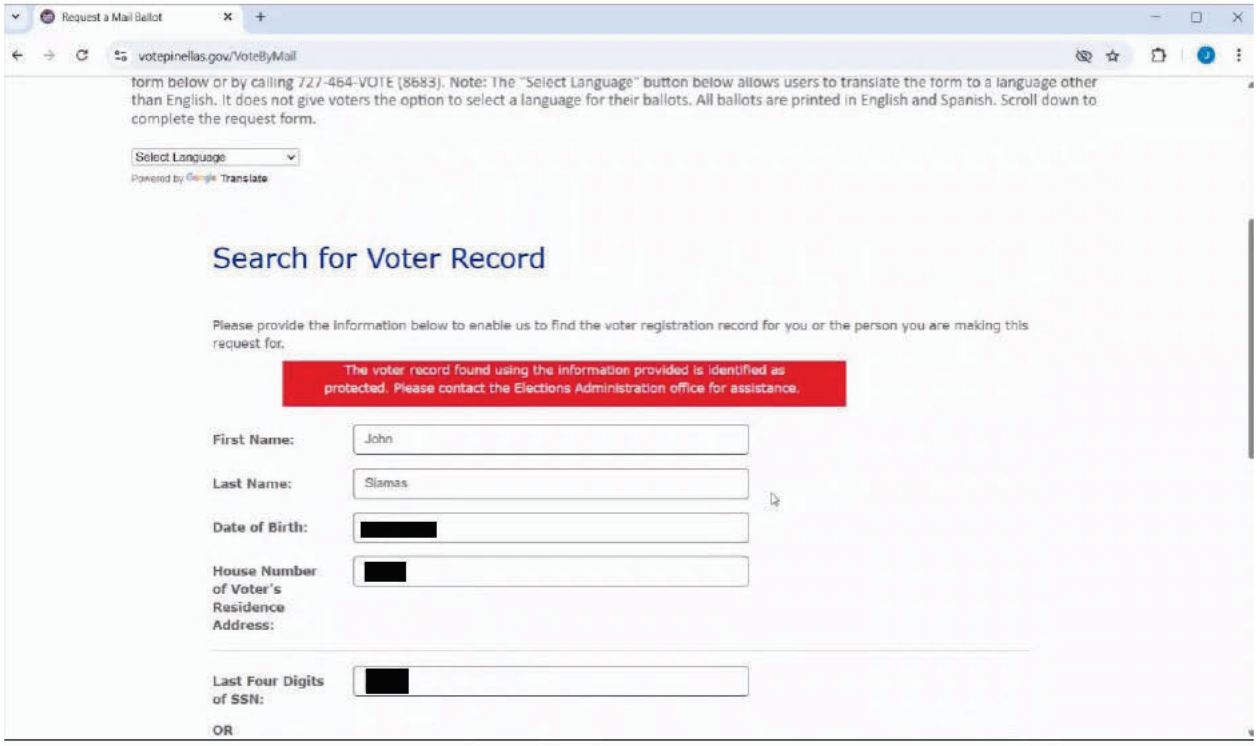

Request a Mail Ballot
votepinellas.gov/VoteByMail
form below or by calling 727-464-VOTE (8683). Note: The "Select Language" button below allows users to translate the form to a language other than English. It does not give voters the option to select a language for their ballots. All ballots are printed in English and Spanish. Scroll down to complete the request form.
Select Language
Powered by Google Translate
Search for Voter Record
Please provide the information below to enable us to find the voter registration record for you or the person you are making this request for.
The voter record found using the information provided is identified as protected. Please contact the Elections Administration office for assistance.
First Name:
John
Last Name:
Siamas
Date of Birth:
House Number of Voter's Residence Address:
Last Four Digits of SSN:
OR

Exhibit 2

Transcription of Conversation with the Pinellas County Supervisor of Election Representative requesting a Mail Ballot on April 11, 2025, 12:20 p.m.

Siamas: Hi good morning, I just tried to apply for my mail ballot, and I guess, not I guess I'm protected so there was a message that said I need to contact the elections administration office for assistance.

Supervisor of Elections Representative: Yea so if it's protected it's not going to allow, I'll do it over the phone.

Siamas: Oh ok so is that what happens, I can't do it online anymore because it's protected?

Supervisor of Elections Representative: Um yea I mean I've found that, I don't know how long it's been like that but yea you call in cause it's a protected address.

Siamas: Ok I'm just curious because I just recently became, You know I just recently submitted my paperwork to.

Supervisor of Elections Representative: Yea so we can do it over the phone.

Siamas: Ok is that cause it said elections administration office, I got a little confused I didn't know whether that is your office or another office.

Supervisor of Elections Representative: Yea it's the Supervisor of Elections Office.

Siamas: Ok, ok fantastic, yea just let me know what's next, I'm sorry.

Supervisor of Elections Representative: I just need your, just need your last name and your date of birth to get started.

Siamas: Ok so it's S-I-A-M-A-S.

Supervisor of Elections Representative: What's your date of birth?

Siamas: [redacted]

Supervisor of Elections Representative: Ok just give me a second.

Siamas: Actually this might apply to my spouse as well I'm assuming right? Because she, they would be included so, she hasn't tried yet but um, but I guess it would be the same process right?

Supervisor of Elections Representative: Um yes it's protected. Last four of

your social to verify the record please.

Siamas: Sure [redacted]

Supervisor of Elections Representative: Ok, and verify your address please.

Siamas: Yea its [redacted]

[redacted] Let me get my, do you need my driver's license?

Supervisor of Elections Representative: Uh, no Sir.

Siamas: Ok

Supervisor of Elections Representative: Give me a second here while I verify your record.

Siamas: Do you know why that is when you are protected, uh you gotta go through this process?

Supervisor of Elections Representative: I don't know why, I do know if somebody didn't have, you have one or the other you have your DL or the last four of your Social and you enter one or the other.

Siamas: Oh, I entered both is that why its coming up.

Supervisor of Elections Representative: No

Siamas: Oh ok ok, I thought I maybe screwed up when I was entering the data.

Supervisor of Elections Representative: Alright so, so your record is updated and it's good until December 31, 2026, so it's all this year and next year, um you are in a county not in a municipality so.

Siamas: Correct.

Supervisor of Elections Representative: So you have nothing scheduled for this year unless we have a special election then you will receive a mail ballot, other than that next year.

Siamas: Ok so I'm good to go when, um.

Supervisor of Elections Representative: You are good to go all the way to next year.

Siamas: So I'll get it in the mail right, I don't have to worry about that or

anything?

Supervisor of Elections Representative: Right, right you'll get it, if for some reason you don't, you can always call or go online to see the status of it.

Siamas: Oh, can I check the status?

Supervisor of Elections Representative: I don't know if you are protected, I don't have that answer.

Siamas: Ok got it, well I'll give it a shot after a couple days, after it gets into the system I guess, I didn't even know you can do that.

Supervisor of Elections Representative: Yea you can check your status, and if you pull that up during an election you can pull that up and it will tell you where your ballot is, when its been mailed, if its been counted, you know that whole process.

Siamas: Gotcha, ok yea I haven't even been in this ballot status thing, I didn't even know it exists to be honest with you, yea I don't expect it to be updated right away so um, I'll um, I'll take a look in.. This is interesting, not that I'm questioning it, I'm just, its interesting how it um, and it's good, I'm very happy that the protected has to go through a um different process.

Supervisor of Elections Representative: My guess is you can't pull up your information since it is protected, also if there is a record request it is protected so a third party could not get that information cause it is protected so that's the whole thing.

Siamas: ok, um fantastic, well thank you so much for your help I um really appreciate it

Supervisor of Elections Representative: Alright have a good

Siamas: Thank you bye bye.

[AFFIANT SIGNATURE]

Sworn to and subscribed before me by means of ✓ physical presence or _____ online notarization, this 28th day of April 2025, by JOHN SIAMAS.

Notary Public – State of Florida

Eliana Pimentel

ELIANA PIMENTEL
Notary Public - State of Florida
Commission # HH 496125
My Comm. Expires May 9, 2028

Personally Known _____ OR Produced Identification ✓

Type of Identification Produced: Drivers License

Appendix Tab 4 - Orders Denying Verified Motions to Disqualify

DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
SECOND DISTRICT
1700 N. Tampa Street, Suite 300, Tampa FL 33602

July 16, 2025

CHRISTOPHER GLEASON,
APPELLANT(S)
V.

JULIE MARCUS, IN HER OFFICIAL CAPACITY AS PINELLAS COUNTY SUPERVISOR OF ELECTIONS, ET AL.,
APPELLEE(S).

CASE NO.: 2D2024-2688
L.T. No.: 522024CA003995XXCICI

BY ORDER OF THE COURT:

To the extent the relief requested in appellant's "Memorandum of Law in Support of Emergency Motion to Disqualify Judges, to Vacate Conflicted Rulings, for Stay of Proceedings, and for Coordination of Related Cases" has not been previously denied, the remainder of the relief requested therein is denied.

Appellant's "Amended and Supplemented Motion to Disqualify County Attorneys and Bar Use of Taxpayer Funds for Defense" is denied.

Appellant's "Motion for Leave to Respond to the April 2, 2025, Show-Cause Order," directed to this court order in case 2D2024-2687 was granted in case 2D2024-2687. To the extent the motion remains pending in this case number, the motion is denied as moot.

Appellant's "Motion to Strike Confidentiality Arguments and for Sanctions under Rule 9.410" is denied.

Appellant's "Motion to Strike Appellees' Motions as Sham Pleadings, Fraud upon the Court, and Evidence of Official Misconduct, Pervasive Conspiracy, Unauthorized Activity, and Bad Faith" is denied.

"Appellee's Motion to Strike or Deny all Pending Motions and Motion to Dismiss" is denied. Appellant shall serve the initial brief within 10 days of the date of this order or this appeal will be dismissed.

Additional motions or pleadings filed prior to the deadline for filing the initial brief shall not tolerate the time for filing the initial brief under Florida Rule of Appellate Procedure 9.300(b).

I HEREBY CERTIFY that the foregoing is a true copy of the original court order.

Mary Elizabeth Kuenzel
Mary Elizabeth Kuenzel, Clerk
2D2024-2688 7/16/25

DS

Served:
PINELLAS CLERK
CHRISTOPHER GLEASON
JARED DOUGLAS KAHN
JEFFREY KLEIN
KELLY LYNN VICARI

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON,

Plaintiff,

vs. **Case No.: 24-003995-CI**

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et. al.,

Defendants.
_____/

ORDER DENYING PLAINTIFF'S RENEWED MOTION FOR RECUSAL/DISQUALIFICATION OF JUDGE PATRICIA MUSCARELLA PURSUANT TO SECTION 38.10, FLORIDA STATUTES

THIS MATTER is before the Court on Plaintiff's Renewed Motion for Recusal/Disqualification of Judge Patricia Muscarella Pursuant to Section 38.10, Florida Statutes ("Motion") dated October 21, 2024. Having considered the Motion, the case file, the applicable law, and being otherwise fully advised in the premises, the Court hereby

FINDS AND ORDERS:

The Motion is legally insufficient. *See* Fla. R. Gen. Prac. & Jud. Admin. 2.330(d).

Accordingly, it is

ORDERED AND ADJUDGED that Plaintiff's Motion is **DENIED.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 22nd day of October 2024. A true and correct copy of the foregoing has been furnished to the parties listed below.

24-003995-CI 10/22/2024 11:08:08 AM
Circuit Judge Patricia A. Muscarella
~~24-003995-CI 10/22/2024 11:08:08 AM~~
Honorable Patricia A. Muscarella
Circuit Civil Judge

ELECTRONICALLY FILED 10/22/2024 11:08:08 AM KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Copies furnished to:

Christopher Gleason
1628 Sand Key Estates Court
Clearwater, FL 33767
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Pro Se Plaintiff

Jared D. Kahn, Esq.
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Counsel for Defendant, Julie Marcus

Jeffrey Klein Esq.
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Counsel for Defendant, Pinellas County Canvassing Board

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON,

Plaintiff,

vs. **Case No.: 24-003995-CI**

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections and PINELLAS COUNTY CANVASSING BOARD,

Defendants.
_____/

ORDER DENYING PLAINTIFF'S VERIFIED MOTION TO DISQUALIFY JUDGE PATRICIA MUSCARELLA

THIS MATTER came before the Court on September 19, 2024, on Plaintiff's Motion to Disqualify Judge Patricia Muscarella. Having considered the motion, the case file, the applicable law, and being otherwise fully advised in the premises, the Court hereby

FINDS AND ORDERS:

that the Motion to Disqualify is legally insufficient.

Accordingly, it is

ORDERED AND ADJUDGED that Plaintiff's Verified Motion to Disqualify Judge Patricia Muscarella is **DENIED.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 19th day of September 2024. A true and correct copy of the foregoing has been furnished to the parties listed below.

24-003995-CI 9/19/2024 1:27:43 PM
Circuit Judge Patricia A. Muscarella
24-003995-CI 9/19/2024 1:27:43 PM

Honorable Patricia Muscarella
Circuit Civil Judge

ELECTRONICALLY FILED 9/19/2024 1:27:43 PM KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

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Pro Se Plaintiff

Julie Marcus
c/o Jared D. Khan, Esq.
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315 Court Street, Sixth Floor
Clearwater, FL 33756
Defendant

Pinellas County Canvassing Board
c/o Jeffrey N. Klein, Esq.
Pinellas County Attorney's Office
315 Court Street, Sixth Floor
Clearwater, FL 33756

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON,

Plaintiff,

vs. **Case No.: 24-003717-CI**

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections; et. al.,

Defendants.

_____/

ORDER DENYING PLAINTIFF'S VERIFIED MOTION TO DISQUALIFY JUDGE PATRICIA MUSCARELLA

THIS MATTER came before the Court on September 19, 2024, on Plaintiff's Motion to Disqualify Judge Patricia Muscarella. Having considered the motion, the case file, the applicable law, and being otherwise fully advised in the premises, the Court hereby

FINDS AND ORDERS:

that the Motion to Disqualify is legally insufficient.

Accordingly, it is

ORDERED AND ADJUDGED that Plaintiff's Verified Motion to Disqualify Judge Patricia Muscarella is **DENIED.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 19th day of September 2024. A true and correct copy of the foregoing has been furnished to the parties listed below.

24-003717-CI 9/19/2024 1:21:37 PM
Circuit Judge Patricia A. Muscarella
24-003717-CI 9/19/2024 1:21:37 PM
Honorable Patricia Muscarella
Circuit Civil Judge

ELECTRONICALLY FILED 9/19/2024 1:21:37 PM KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

Copies furnished to:

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Defendant

Dustin Chase
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Defendant

Matt Smith
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Defendant

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON,

Plaintiff,

vs. **Case No.: 24-003717-CI**

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et. al.,

Defendants.
_____/

ORDER DENYING PLAINTIFF'S RENEWED MOTION FOR RECUSAL/DISQUALIFICATION OF JUDGE PATRICIA MUSCARELLA PURSUANT TO SECTION 38.10, FLORIDA STATUTES

THIS MATTER is before the Court on Plaintiff's Renewed Motion for Recusal/Disqualification of Judge Patricia Muscarella Pursuant to Section 38.10, Florida Statutes ("Motion") dated October 21, 2024. Having considered the Motion, the case file, the applicable law, and being otherwise fully advised in the premises, the Court hereby

FINDS AND ORDERS:

The Motion is legally insufficient. *See* Fla. R. Gen. Prac. & Jud. Admin. 2.330(d).

Accordingly, it is

ORDERED AND ADJUDGED that Plaintiff's Motion is **DENIED.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 22nd day of October 2024. A true and correct copy of the foregoing has been furnished to the parties listed below.

24-003717-CI 10/22/2024 11:08:28 AM
Circuit Judge Patricia A. Muscarella
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Honorable Patricia A. Muscarella
Circuit Civil Judge

Copies furnished to:

Christopher Gleason
1628 Sand Key Estates Court

ELECTRONICALLY FILED 10/22/2024 11:08:28 AM KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

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Counsel for Defendants

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON,

Plaintiff,

vs. **Case No.: 24-003995-CI**

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections and PINELLAS COUNTY CANVASSING BOARD,

Defendants.
_____/

ORDER DENYING PLAINTIFF'S VERIFIED MOTION TO DISQUALIFY JUDGE PATRICIA MUSCARELLA

THIS MATTER came before the Court on September 19, 2024, on Plaintiff's Motion to Disqualify Judge Patricia Muscarella. Having considered the motion, the case file, the applicable law, and being otherwise fully advised in the premises, the Court hereby

FINDS AND ORDERS:

that the Motion to Disqualify is legally insufficient.

Accordingly, it is

ORDERED AND ADJUDGED that Plaintiff's Verified Motion to Disqualify Judge Patricia Muscarella is **DENIED.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 19th day of September 2024. A true and correct copy of the foregoing has been furnished to the parties listed below.

24-003995-CI 9/19/2024 1:27:43 PM
Circuit Judge Patricia A. Muscarella
24-003995-CI 9/19/2024 1:27:43 PM

Honorable Patricia Muscarella
Circuit Civil Judge

ELECTRONICALLY FILED 9/19/2024 1:27:43 PM KEN BURKE, CLERK OF THE CIRCUIT COURT, PINELLAS COUNTY

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Pro Se Plaintiff

Julie Marcus
c/o Jared D. Khan, Esq.
Pinellas County Attorney's Office
315 Court Street, Sixth Floor
Clearwater, FL 33756
Defendant

Pinellas County Canvassing Board
c/o Jeffrey N. Klein, Esq.
Pinellas County Attorney's Office
315 Court Street, Sixth Floor
Clearwater, FL 33756

IN THE CIRCUIT COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

CHRISTOPHER GLEASON,

Plaintiff,

vs. **Case No.: 24-003995-CI**

JULIE MARCUS, in her official capacity as Pinellas County Supervisor of Elections, et. al.,

Defendants.
_____/

ORDER DENYING PLAINTIFF'S RENEWED MOTION FOR RECUSAL/DISQUALIFICATION OF JUDGE PATRICIA MUSCARELLA PURSUANT TO SECTION 38.10, FLORIDA STATUTES

THIS MATTER is before the Court on Plaintiff's Renewed Motion for Recusal/Disqualification of Judge Patricia Muscarella Pursuant to Section 38.10, Florida Statutes ("Motion") dated October 21, 2024. Having considered the Motion, the case file, the applicable law, and being otherwise fully advised in the premises, the Court hereby

FINDS AND ORDERS:

The Motion is legally insufficient. *See* Fla. R. Gen. Prac. & Jud. Admin. 2.330(d).

Accordingly, it is

ORDERED AND ADJUDGED that Plaintiff's Motion is **DENIED.**

DONE AND ORDERED in Chambers at Clearwater, Pinellas County, Florida, this 22nd day of October 2024. A true and correct copy of the foregoing has been furnished to the parties listed below.

24-003995-CI 10/22/2024 11:08:08 AM
Circuit Judge Patricia A. Muscarella
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Counsel for Defendant, Julie Marcus

Jeffrey Klein Esq.
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eservice@pinellascounty.org
Counsel for Defendant, Pinellas County Canvassing Board

DISTRICT COURT OF APPEAL OF THE STATE OF FLORIDA
SECOND DISTRICT
1700 N. Tampa Street, Suite 300, Tampa FL 33602

May 1, 2025

CHRISTOPHER GLEASON,
APPELLANT(S)
V.

JULIE MARCUS, IN HER OFFICIAL CAPACITY AS PINELLAS COUNTY SUPERVISOR OF ELECTIONS, ET AL.,
APPELLEE(S).

CASE NO.: 2D2024-2688
L.T. No.: 522024CA003995XXCICI

BY ORDER OF THE COURT:

Appellant's "Emergency motion to disqualify judges Nelly N. Khouzam, Morris Silberman, Craig C. Villanti, Anthony K. Black, Edward C. LaRose, and Susan H. Rothstein-Youakim, to vacate conflicted rulings, for stay of proceedings, and for coordination of related cases," "Motion to disqualify Judge Nelly N. Khouzam," "Motion to Disqualify Judge Morris Silberman," and "Motion to vacate all orders issued by disqualified judges based on structural errors and void judicial acts" filed in cases 2D2024-2687 and 2D2024-2688 are denied.

I HEREBY CERTIFY that the foregoing is a true copy of the original court order.

Mary Elizabeth Kuenzel
Mary Elizabeth Kuenzel, Clerk
2D2024-2688 5/1/25

JR

Served:
PINELLAS CLERK
CHRISTOPHER GLEASON
JARED DOUGLAS KAHN
JEFFREY KLEIN
KELLY LYNN VICARI

Appendix Exhibit – Authorities Table

This Authorities Table compiles the statutes, rules, canons, and case law cited in support of the **Amended Petition for Writ of Prohibition and All-Writs Relief**, as supplemented by the *Judicial Conflict Appendix with Tabs*. It provides pinpoint authority for each asserted ground of disqualification and jurisdictional defect.

Statutory Authorities

Citation	Subject	Key Principle
§ 38.02, Fla. Stat.	Disqualification – Judge as party, relative, or witness	Requires disqualification when judge or close family member is a party, material witness, or otherwise directly interested.
§ 38.10, Fla. Stat.	Disqualification – Fear of bias	Party affidavit alleging fear of prejudice requires judge to proceed no further.
§ 97.0585, Fla. Stat.	Protected voter status	Judicial officers and family are “protected voters”; unauthorized access to their records requires insider override.
§ 101.62(1)(b), Fla. Stat.	VBM ballot request requirements	Requires valid DL number or last four digits of SSN; requests without ID are invalid.
§ 104.011(1), Fla. Stat.	False affirmations	Criminalizes making false affirmations in connection with elections.

Citation	Subject	Key Principle
§ 104.043–104.047, Fla. Stat.	Election crimes	Covers fraudulent VBM requests, unauthorized access, ballot harvesting.
§ 104.43, Fla. Stat.	Grand jury duty	Grand jury “shall” investigate election crimes upon request of any candidate or voter.
§ 812.014, Fla. Stat.	Theft of public funds	Misuse of public resources > $100,000 constitutes felony theft.
§ 838.022, Fla. Stat.	Official misconduct	Criminalizes public officers’ knowing misuse of their position.

Rules of Procedure and Administration

Citation	Subject	Key Principle
Fla. R. Gen. Prac. & Jud. Admin. 2.330	Judicial disqualification	Establishes procedure; motions deemed granted if not ruled on within 30 days; legally sufficient allegations must be accepted as true.
Fla. R. Civ. P. 1.500(a)	Defaults	Clerk shall enter default when a party fails to appear.
Fla. R. Civ. P. 1.380(e)	Spoliation/adverse inference	Failure to preserve evidence may result in sanctions/adverse inference.
Fla. R. Gen. Prac. & Jud. Admin. 2.420	Public access to judicial records	Sealing requires written findings; blanket sealing is improper.

Florida Code of Judicial Conduct

Canon	Subject	Key Principle
Canon 1	Integrity and independence of judiciary	Judges must maintain public confidence in impartiality.
Canon 2A	Avoiding appearance of impropriety	Judges must avoid not only impropriety but its appearance.
Canon 3E(1)	Disqualification	Mandatory when impartiality might reasonably be questioned, judge is material witness, or close relative has interest.

Case Law – Florida

Case	Citation	Principle
Livingston v. State	441 So. 2d 1083 (Fla. 1983)	Disqualification test is objective: whether facts would cause a reasonably prudent person to fear unfairness. Allegations taken as true.
Jenkins v. Motorola, Inc.	911 So. 2d 196 (Fla. 3d DCA 2005)	All orders entered after a legally sufficient disqualification motion are void ab initio.
Rivera v. State	717 So. 2d 477 (Fla. 1998)	Judicial bias is structural error requiring reversal.
State v. Smith	240 So. 2d 807 (Fla. 1970)	Fundamental error occurs when fairness of proceedings is destroyed.

Case	Citation	Principle
Lightsey v. State	53 So. 3d 1093 (Fla. 1st DCA 2011)	A judge who is a material witness must recuse.
Ruff v. Cooper	169 So. 490 (Fla. 1936)	Unrebutted prima facie evidence shifts burden to opposing party.
Bainter v. League of Women Voters	150 So. 3d 1115 (Fla. 2014)	Broad discovery rights in election disputes; refusal to compel evidence is error.
Public Health Trust v. Valcin	507 So. 2d 596 (Fla. 1987)	Missing or destroyed records create presumption of negligence; adverse inference allowed.
Sanford v. Rubin	237 So. 2d 134 (Fla. 1970)	Absence of indispensable party renders judgment void.
Ervin v. Collins	85 So. 2d 852 (Fla. 1956)	Election contest requires candidate's joinder as indispensable party.

Case Law – U.S. Supreme Court

Case	Citation	Principle
Williams v. Pennsylvania	579 U.S. 1 (2016)	Judge's prior involvement as victim/prosecutor is structural error not subject to harmless-error review.
Caperton v. A.T. Massey Coal Co.	556 U.S. 868 (2009)	Due process violated where judge has personal stake creating probability of bias.

Case	Citation	Principle
Boardman v. Esteva	323 So. 2d 259 (Fla. 1975), aff'd sub nom. *Boardman v. Esteva*, 336 So. 2d 141 (Fla. 1976)	Strict compliance required in election statutes; irregularities affecting result invalidate election.
Thornburg v. Gingles	478 U.S. 30 (1986)	Establishes standards for discriminatory election practices; cited by analogy to systemic irregularities.

Attorney General Opinions (Florida)

Opinion No.	Principle
AGO 77-87	County may not expend public funds for defense of incumbent in election contest.
AGO 2001-55	Public funds cannot be used to defend incumbent in § 102.168 action.
AGO 2008-42	Taxpayer-funded defenses for election officials in personal/candidate capacity prohibited.
AGO 2017-05	Same principle: representation of officials in candidate role with public funds is unlawful.

Summary

- **Statutes & Rules** establish *mandatory* disqualification and election law compliance duties.

- **Canons & JEAC Opinions** confirm ethical duty to recuse when judges or family are implicated.
- **Florida and U.S. Supreme Court precedent** treats judicial bias as **structural error** voiding all orders.
- **Attorney General Opinions** show that taxpayer-funded defenses of incumbents in candidate capacity are unlawful.

Conclusion: This Authorities Table supplies the controlling law to accompany the Judicial Conflict Chart (Appendix Exhibit A) and the motions/orders annex, together forming a complete record supporting prohibition and reassignment.

Appendix Exhibit – Application Table (Authorities Applied to Facts)

This table links each judicial conflict documented in the *Judicial Conflict Appendix with Tabs* and Chart (Appendix Exhibit A) with the controlling authorities listed in the Authorities Table (Appendix Exhibit B). It shows how each legal principle applies directly to the facts of this case, demonstrating why prohibition and reassignment are the only lawful remedies.

Application Table

Judge / Tribunal	Documented Conflict	Controlling Authorities	Application to Facts
Trial Judge Muscarella	Victim of fraudulent VBM requests; material witness; denied discovery; sealed exhibits; denied verified motions as "legally insufficient."	§ 38.02 (material witness); Rule 2.330(e)(1), (g); *Livingston*; *Lightsey*; *Jenkins*; Canon 3E(1).	Unauthorized ballot requests in her name make her both victim and material witness. Verified motions for disqualification were timely and legally sufficient under *Livingston*. Denials were improper, rendering all subsequent rulings void ab initio under *Jenkins*.
Trial Judge Ramsberger	Multiple family members (including son Judge Thomas Ramsberger, daughter-in-law Angela, and others) listed in DOS reports as victims	§ 38.02; Rule 2.330(e)(2); Canon 3E(1)(d); JEAC Op. 17-20; *Williams*; *Livingston*.	Familial victimization creates an automatic disqualification. Proceeding despite close family members' involvement is structural error under *Williams* and a well-founded fear of bias under *Livingston*.

Judge / Tribunal	Documented Conflict	Controlling Authorities	Application to Facts
	of fraudulent VBM anomalies.		
Chief Judge Crane	Presided in trial; judicial assistant listed as VBM victim; received 200+ affidavits demanding grand jury under § 104.43 but refused to convene; assigned cases to conflicted judges.	§ 104.43; § 38.02; Rule 2.330(e)(4); *Livingston*; *Williams*; *Jenkins*; Canon 2A & 3E(1).	Administrative misconduct and personal knowledge of disputed affidavits make Crane a material witness. His refusal to convene a mandatory grand jury violates § 104.43 and constitutes official misconduct under § 838.022. Orders are void for structural error.
2DCA Judge Villanti	Victim of fraudulent VBM requests in DOS reports; protected voter status overridden; only he can testify to authorization.	§ 38.02; Rule 2.330(e)(1); *Lightsey*; *Livingston*; *Jenkins*.	Fraudulent entries in his own voter record make him a direct victim and material witness. His continued participation created structural error and void orders.
2DCA Judge Khouzam	Victim of fraudulent VBM requests; protected voter override; spouse is Judge Silberman, also implicated.	§ 38.02; Rule 2.330(e)(2); Canon 3E(1); JEAC Op. 17-20; *Livingston*; *Williams*.	Both she and her spouse were implicated in fraudulent ballot requests. Dual conflicts create a reasonable fear of bias under *Livingston* and mandatory

Judge / Tribunal	Documented Conflict	Controlling Authorities	Application to Facts
			disqualification under Canon 3E(1).
2DCA Judge Silberman	Victim of fraudulent VBM requests; daughter's voter record compromised; spouse (Khouzam) implicated.	§ 38.02; Rule 2.330(e)(2), (e)(4); Canon 3E(1)(d); *Livingston*; *Williams*; JEAC Op. 17-20.	His and his daughter's records appear in fraudulent logs. Familial conflict plus victimization requires disqualification. His rulings are structural error and void.
2DCA Judge Black	Retention election directly impacted by fraudulent ballots processed in Pinellas County.	§ 38.10; Canon 2A & 3E(1); *Caperton*; *Williams*.	Fraudulent ballots tainted his 2024 retention election. A judge cannot rule in a case that undermines the legitimacy of his own election. Structural error.
2DCA Judge LaRose	Retention election outcome directly impacted by fraudulent ballots.	Same as Judge Black: § 38.10; Canon 2A & 3E(1); *Caperton*; *Williams*.	His personal stake in his retention election creates a constitutionally intolerable risk of bias (*Caperton*). Orders void.
2DCA Judge Rothstein-Youakim	Retention election affected; both parents (Rita and Arthur) listed in fraudulent VBM anomalies.	§ 38.02; Rule 2.330(e)(2); *Livingston*; JEAC Op. 17-20; *Williams*.	Her election and her parents' records were both directly implicated. Dual personal/familial conflicts mandate recusal. Continued

Judge / Tribunal	Documented Conflict	Controlling Authorities	Application to Facts
			rulings were structural and fundamental error.

Summary of Application

- Every judge identified in the Petition was subject to **mandatory disqualification** under §§ 38.02, 38.10, Rule 2.330, and Canon 3E.
- **Livingston** requires allegations to be accepted as true; each motion was legally sufficient.
- **Williams** and **Caperton** establish that participation by conflicted judges constitutes **structural error**, not harmless error.
- **Jenkins** establishes that all rulings after denial of sufficient motions are **void ab initio**.
- These conflicts extinguished jurisdiction in both the Sixth Circuit and the Second DCA.

Conclusion: This Application Table links the conflicts in the Judicial Conflict Appendix with the controlling law, showing a unified record of mandatory disqualification, structural error, and void proceedings. It provides the factual-to-legal bridge supporting prohibition and reassignment under **Art. V, § 2(b), Fla. Const.**